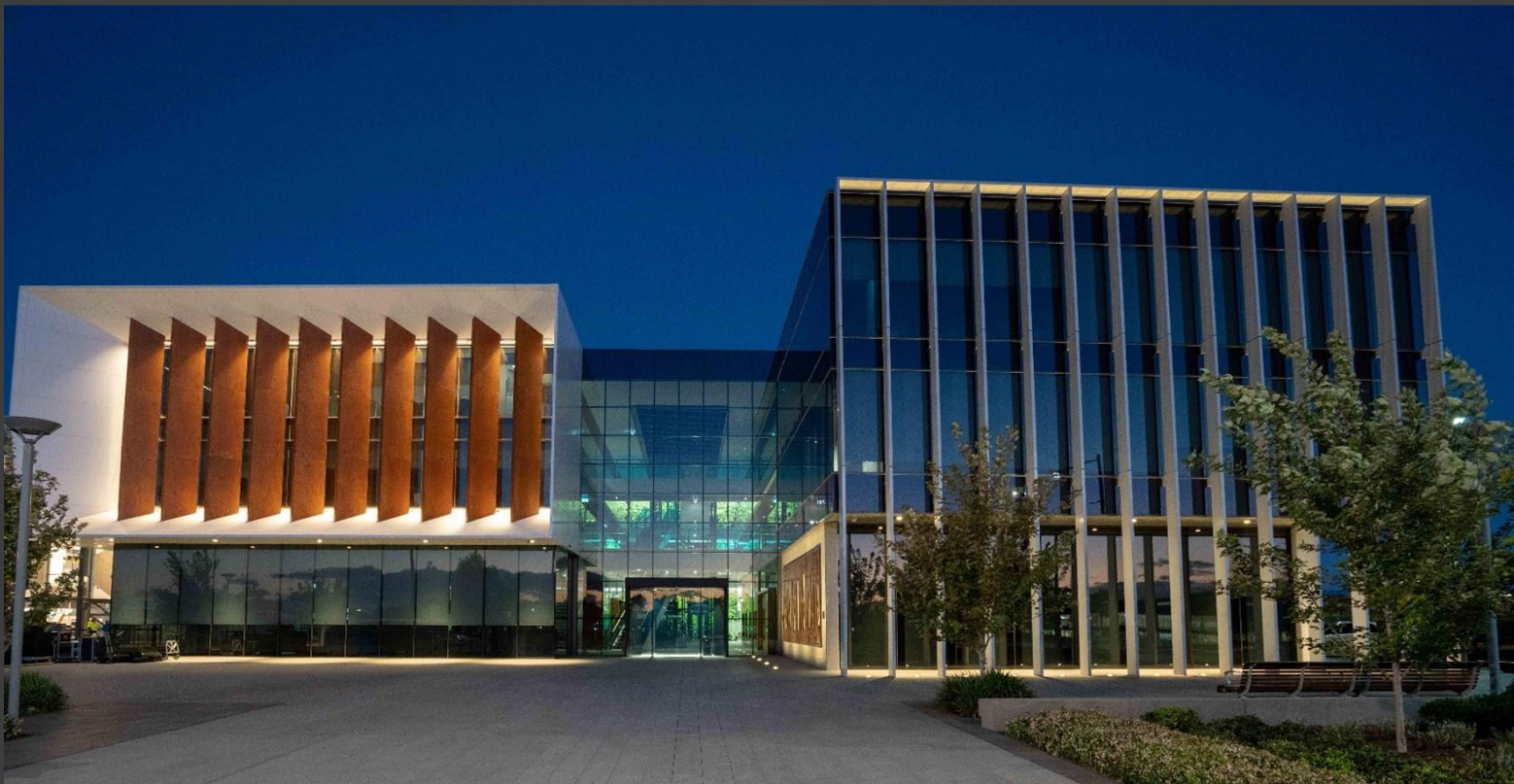


Attachments

Ordinary Council Meeting

Camden Council
Administration Centre
70 Central Avenue
Oran Park

13 February 2024



camden
council

ATTACHMENTS

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Submission – Environmental Impact Statement Western Sydney International Airport January 2024





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Executive Summary

Key Messages

The Australian Government's Western Sydney International (Nancy-Bird Walton) Airport (WSI) project is already facilitating significant change to Western and South-Western Sydney on the ground, with the proposed WSI 'Airspace and Flight Path Design' to transform it even further, from the air.

The following Council submission to the Australian Government seeks to articulate the views of the community of the Camden LGA, based on an assessment of the information presented in the 'WSI Preliminary Flight Paths and Draft Environmental Impact Statement' (Draft EIS).

Notably, Camden is the fastest growing LGA in Australia and today comprises a community of over 130,000 residents. When WSI opens in 2026 our community will have grown to over 150,000 residents, with planned growth to support a future community of over 250,000 residents once the proposed airport is fully developed. In this regard, it is both the current community, as well as the community of the future that Council seeks to represent through the following submission.

In this submission Council has identified a number of key issues regarding the Draft EIS for the WSI 'Airspace and Flight Path Design', (not the least of which is how it is based only on a single runway, and not a dual runway option); highlighting points of concern, implications and recommendations for further action on the part of the Australian Government. Council's submission is structured in response to issues identified as important to the Camden LGA community, in response to the Australian Government's Draft EIS.

Of particular concern to Council is the issue of regional equity. Aircraft noise impacts arising from WSI's proposed 24-hour operations will be far greater in the South-West Sydney communities that surround WSI than the Eastern Sydney communities that surround KSA, which limits aircraft noise impacts by prohibiting night-time aircraft movements. A more balanced and equitable approach to controlling aircraft noise impacts across the entire Sydney region is required.

Following is an overview of the key messages identified by Council, which are further detailed in this submission. Another key concern is the limited access made available by the Australian Government to data used in formulating the Draft EIS e.g. access to the detailed data for noise receptive sensors in the Camden LGA.

Council recommends that the Australian Government respond to the following key issues for the Camden LGA and conduct further work on the Draft EIS before proceeding any further with WSI's proposed operation.

Aircraft Noise

As the nation's air traffic management provider, Airservices Australia is an Australian Government owned organisation tasked with providing environmentally sustainable



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services in aviation. Specifically, in its statement of commitment to aircraft noise management, Airservices Australia claim that they “are committed to world’s best practice aircraft noise management process and practice”. In contrast, the following points reflect that the Australian Government’s Draft EIS falls short of ‘world’s best practice’ when it comes to Aircraft Noise for the proposed WSI flight paths, and requires the following action.

Recommended that the Australian Government:

- Acknowledge that a growing future population projected of up to 100,000 additional residents (by 2036) in adjacent areas of the Camden LGA may be negatively impacted by the ‘Reciprocal Runway Operations’ (RRO) for WSI, and that the Draft EIS is amended to reflect that the RRO option has the potential for the greatest adverse impact on the Camden LGA community and identifies actions for mitigation that are enforceable on the future operators of WSI;
- Ensure that any RRO flight path option is following recommended levels for night noise exposure of 40dB for aircraft noise, as per the World Health Organisation’s (WHO) ‘*Compendium of WHO and other UN guidance on health and environment (2022 update)*’ (Ch11. Page2);
- Review the WSI flight path design in developing the following airspace management strategies for minimising aircraft noise impacts on the Camden LGA;
 - Overflight avoidance;
 - Overflight dispersion; and
 - Overflight mitigation procedures.
- Revisit the Sydney Basin airspace design, including preparation of an updated EIS for Sydney Kingsford-Smith Airport (KSA) inclusive of options for its 24-hour operation, to ensure an equitable management of aircraft movements for all residents in the Greater Sydney Region;
- Review and update the Draft EIS to ensure that all measurements/analysis of night-time aircraft movements are based on the metrics used for sleep disturbance i.e. 11:00pm to 7:00am;
- Refer a copy of the ‘*Draft EIS: Technical Paper 1 - Aircraft Noise*’ to the Aircraft Noise Ombudsman for assessment; and
- Ensure the scope of the ‘Noise Insulation and Property Acquisition’ (NIPA) Policy is expanded to include those land owners in the Camden LGA that are directly impacted by aircraft noise from the future operation of WSI e.g. in the N70 contour areas.



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Air Quality

Air pollution is one of the world's greatest environmental risks to human health, catalysing the burden of disease from stroke, heart disease, lung cancer, and both chronic and acute respiratory diseases, including asthma. Despite these facts, the Australian Government is proposing to increase the volume of air pollution over the Camden LGA via operation of WSI. It is critical to the health and wellbeing of the Camden LGA that the Australian Government responds to the following issues pertaining to Air Quality.

Recommended that the Australian Government:

- Review the 'Draft EIS: Technical Paper 2 – Air Quality' for WSI to ensure;
 - It adheres to the World Health Organisation's (WHO's) '2021 Global Air Quality Guidelines', in maintaining the basic human rights of the Camden LGA community of access to clean air;
 - That any approval of the flight paths and endorsement of the Draft EIS includes the provision that stipulates an ongoing requirement for the Australian Government to monitor Air Quality in perpetuity, and that WSI's operation is managed to ensure that Air Quality standards are always maintained in accordance with the WHO's Global Air Quality guidelines; and
 - That the Draft EIS for WSI is updated to include analysis of PM_{2.5} and PM₁₀ data for the RRO, in light of the fact that this runway option is likely to have the most adverse impact on the Camden LGA community.
- Review the Draft EIS to include a comprehensive mitigation management strategy for air quality, and that this imperative is reflected via the ongoing monitoring of aircraft emissions on the part of the Australian Government;
- Conduct risk estimates for multiple periods up to the capacity year 2055 (e.g. 2033, 2038, 2045, 2050), that they are done so separately for each pollutant, and that the Draft EIS is updated to reflect this analysis;
- Update the Draft EIS to reflect actual data from sensitive receptors located in the Camden LGA, along with further analysis including community feedback on health concerns and describe how this feedback was considered and addressed in the assessment, in developing an Air Quality Management Framework/Plan for the Camden LGA, South Western Sydney and Western Sydney;
- Update the Draft EIS to establish parameters on the extent of acceptable Air Quality resulting from the operation of WSI, and limit WSI's operation subject to the maintenance of those acceptable Air Quality parameters;
- Actively promotes transparency in its public consultation on the WSI Draft EIS, by making available all background studies on issues such as Air Quality, as well as the other components that form part of the overall environmental impact assessment; and



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- Accurately map the 'local study area' and 'regional study area' for Air Quality in the Draft EIS, and conduct a review of 'Technical Paper 2 - Air Quality' to correct all anomalies.

Greenhouse Gas Emissions

Council is committed to facilitating action on sustainability initiatives in our local area and working with the Camden LGA community and other important local stakeholders to protect and enhance our natural environment, as reflected in our 'Sustainability Strategy 2020 - 2024'. However, Council's strong local leadership of actioning sustainable environment initiatives is at risk from WSI's future operation, with the following action required from the Australian Government in mitigating its adverse impacts from greenhouse gas emissions.

Recommended that the Australian Government:

- Amend the Draft EIS to include the statutory requirement of the appropriate Australian Government agency and/or airport operator to manage greenhouse gas emissions mitigation and monitoring systems, for future operation of WSI;
- Direct WSA Co to prepare the proposed WSI 'Operational Sustainability Strategy' and 'Operational Sustainability Plan', and in doing so, that WSA Co engages with all stakeholders in their preparation. Further, these strategies and plans must include enforceable targets to reduce greenhouse gas emissions, and ensure that WSI's ongoing operation is contingent on meeting those reduced targets;
- Make the necessary statutory arrangements to ensure that medium and long-haul flight services are predominantly operated to/from Sydney Kingsford-Smith Airport (KSA), to actively mitigate the adverse impacts from greenhouse gas emissions to the Western Parkland City; and
- Conduct a thorough analysis of the quantifiable impacts of greenhouse gas emissions resulting from the operation of WSI, and implement a meaningful mitigation strategy to safeguard the health and wellbeing for the Camden LGA community.

Hazard and Risk

WSI's 24-hour operation will put the Camden LGA community at risk. While the Draft EIS has attempted to quantify some of the foreseeable hazards, more work is required by the Australian Government in managing risk mitigation, as well as greater transparency and community education in explaining the hazards and risks associated with large commercial aircraft operating where people live.

Recommended that the Australian Government:



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- Update the Draft EIS to include an accurate representation that appropriately quantifies and reflects the identified potential risk to human life resulting from the operation of WSI;
- Update the Draft EIS to include actual examples (either domestic or international) where fuel dumping has occurred over land, supported by analysis of the associated resulting impacts on environmental issues such as air quality, water quality, biodiversity etc as well as on human health, and the mitigation measures utilised to manage this hazard and risk;
- Review and update the BoM's 2015 '*Western Sydney Airport Usability Report*', and in turn update the Draft EIS, to ascertain what impact combustion of jet fuel releases will have on fog climatology over the Camden LGA or at the WSI site, for the safe management and operation of WSI; and
- Analyse the risk as to the number of occurrences from ice falling to ground from aircraft, particularly from those operating in airspace that may catalyse such events, and update the Draft EIS to quantify the likely number of events where ice could fall from aircraft over areas of the Western Parkland City.

Wildlife Strike Risk

The future location of a second major airport in the Sydney Basin was confirmed by the Australian Government in 2014. Yet, to date, meaningful analysis of existing wildlife movements in the area and the potential for impacts resulting from the operation of a major airport have not been completed. The subsequent inquiries made regarding Wildlife Strike Risk via the Draft EIS fall short of what is needed for both conservation management and public safety considerations; therefore, the following action is required on the part of the Australian Government.

Recommended that the Australian Government:

- Conduct a comprehensive high-level wildlife movement study and wildlife strike risk mitigation strategy for inclusion in the Draft EIS;
- Convene the 'WSI Wildlife Hazard Management Committee' (WHMC) as a matter of urgency, and that its membership includes a representative from Camden Council, as well as the National Parks and Wildlife Service (NPWS);
- Updates the Draft EIS to comprehensively address the inherent risks associated with increased wildlife activity in the Western Parkland City, and that this is managed relative to the safe operation of WSI airspace over the Camden LGA; and
- Further quantify the analysis of potential for Wildlife Strike Risk, through incremental, sustained and combined analysis of the projected risks.



Land Use and Planning

The future location of a second major airport in the Sydney Basin has long been established, and Council has upheld the statutory land use planning controls required to enable its future operation. However, there are gaps evident in the Draft EIS when it comes to land use planning, the following of which require further action on the part of the Australian Government.

Recommended that the Australian Government:

- Review and update the Draft EIS to reflect the extent of adverse noise impacts in existing and future residential areas in the Camden LGA beyond the average of ANEF/ANEC contours; and
- Review and update the Draft EIS to ensure that its assessment of impacts for land use planning reflect the future WSI dual runway option.

Landscape and Visual Amenity

The projected impacts on Landscape and Visual Amenity in the Camden LGA resulting from the future WSI operation is a key risk for our community. As noted in Council's 'Community Strategic Plan 2036', the Camden LGA community places a high value on our natural environment and where we live and work.

In responding to the vision of our community for a future Camden LGA, the following action is required by the Australian Government in contributing toward the preservation of our local landscape and visual amenity.

Recommended that the Australian Government:

- Review the Draft EIS to articulate/define the meaning of landscape character and visual amenity impact assessment ratings e.g. high, moderate, low, negligible, and for LCZ10 area, evaluate the sensitivity and magnitude of change for landscape character and visual amenity for the Reciprocal Runway Operations (RRO) of WSI;
- Update the Draft EIS to include pictorial (silhouette) representations of the night-time visual impacts on the Camden LGA from aircraft movements, and the inclusion of a proper assessment of the night-time visual impacts, resulting from the RRO of WSI;
- Review the Draft EIS to include the South West Rail Link (SWRL) Extension in the list of projects contributing toward cumulative impacts, and quantify how in conjunction with WSI it will impact the landscape and visual amenity in part of the Camden LGA community i.e. LCZ10; and
- Review the Draft EIS to ensure the assessment of the LCZ10 zone includes an 'objective' assessment of the visual impacts resulting from RRO of WSI, with a quantifiable measurement of any change to the character of this zone.



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Biodiversity

As noted in Council's *'Community Strategic Plan 2036'*, the vision for environmental conservation in the Camden LGA is:

"Our natural environment and waterways are protected, well maintained and enhanced for community enjoyment."

In leading the protection of the Camden LGA's natural environment and waterways, Council developed its *'Biodiversity Strategy 2023'* which includes actions to protect, enhance and manage biodiversity values.

The Draft EIS has no regard to Council's *'Biodiversity Strategy 2023'* i.e. it makes no reference to its initiatives, actions or vision. In this regard, it is recommended that the Australian Government receive and consider a copy of Council's Biodiversity Strategy, along with the following recommendations regarding biodiversity impacts resulting from WSI.

Recommended that the Australian Government:

- Re-visit the Draft EIS for WSI, and uphold its responsibility to protect Australia's unique animals, plants, habitats and place, in quantifying and implementing offsets to the adverse impacts on biodiversity resulting from the WSI project;
- Re-visit the commitments to protect vulnerable species identified in the 2015 Draft EIS to ensure their implementation, and commit to conducting a thorough long-term baseline study of movement and foraging ecology of Flying-Foxes in proximity to WSI;
- Update the Draft EIS to include a report detailing a robust and rigorous monitoring program for all relevant issues including but not limited to candidate species, 'Matters of National Environmental Significance' (MNES) and 'Species Impact Assessment' (SIA) against agreed thresholds (with a safety buffer), evaluation, reporting and the full scope of adaptive management strategies; and
- Review the Draft EIS and identify mitigation measures that respond to the potential for cumulative impacts on Biodiversity resulting from the operation of WSI.

Heritage

Heritage is an important part of the character of the Camden LGA, including a diverse range of items, places, and precincts of both Aboriginal and Non-Aboriginal heritage significance. Heritage significance includes all the values that make these items, places or precincts special and in need of preservation. The Draft EIS does not adequately assess the heritage impacts associated with WSI. More work is needed in this regard, including the following updates to the Draft EIS.

Recommended that the Australian Government:



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- Review and amend the Draft EIS to quantify impact mitigation for all places of Aboriginal heritage and cultural significance in the Camden LGA, resulting from the future operation of WSI; and
- Conduct a wholesale review of the Non-Aboriginal Heritage section of the Draft EIS, to ensure that all heritage listed sites in the Camden LGA are assessed and necessary mitigation measures resulting from the future operation of the WSI flight paths are implemented.

Social

Development of the WSI project is likely to impact the social fabric of the Western Parkland City, including the Camden LGA. The extent of the social impacts, either positive or negative, will take time to emerge, long after the airport is built and operational. It is therefore critical that the Australian Government has due regard to the following social issues prior to proceeding with the WSI project.

Recommended that the Australian Government:

- Consult with residents in the Camden LGA on the social impacts resulting from WSI, and update the Draft EIS to reflect a more appropriate sample set of consultation from across the broader Western Parkland City in conducting a comprehensive social impact assessment of WSI;
- Expand the Draft EIS (i.e. conducted by DITRDCA, not WSA Co.) to quantify all of the social impact issues on the Camden LGA community resulting from WSI, and that DITRDCA (not WSA Co.) facilitate consultation with the Camden LGA community in developing an action plan that fully responds to each of the social impact issues identified;
- Conduct a review of the Draft EIS and *Technical Paper 10 - Social*, and that DITRDCA (i.e. not WSA Co) facilitates this review in collaboration with the Department of Social Services and NSW Health, in looking after the health and wellbeing of the Camden LGA community, in mitigating adverse health impacts resulting from operation of WSI; and
- Acknowledge that the WSI project will result in a loss of residential amenity in the Camden LGA from the RRO operation, and that this is reflected and addressed in the Draft EIS.

Economic

The Economic implications associated with WSI are well documented and were generally assessed as part of the 2016 EIS for the WSI Airport Plan – Stage 1. However, the current Draft EIS falls short in quantifying the adverse Economic impacts resulting from the proposed flight path design for operation of WSI, particularly how it relates to the perennially sensitive issue of land value. In this regard, the Australian Government must consider the following.



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Recommended that the Australian Government:

- Review the Draft EIS in analysing growth rates for properties affected by WSI being on par with other non-affected areas in Sydney. Whilst this may be the case with respect to growth rates, there is likely to be very different actual sale value starting points i.e. lower land values in noise affected areas than non-affected areas consistent with the findings of other literature cited by the Draft EIS.

Human Health

Further to the points noted previously regarding the social impacts on the Camden LGA community from WSI, there is evidence in the Draft EIS for the potential of adverse impacts to human health resulting from its operation. Issues such as sleep deprivation due to overnight aircraft noise, and poor air quality have a direct correlation with morbidity in the community. The Australian Government have a duty of care to Camden LGA residents in responding to the following recommendations for human health regarding the operation of WSI.

Recommended that the Australian Government:

- Review and update the Draft EIS to quantify and reflect the impacts to the Camden LGA community resulting from WSI, particularly the cumulative adverse impacts to human health;
- Ensure the Draft EIS appropriately reflects a warning as to the possible hazards to human health for residents in the Camden LGA and broader Western Parkland City resulting from poor air quality generated by operation of WSI;
- Review the Draft EIS to include a qualitative analysis and discussion of impacts/risks/effects on vulnerable/sensitive groups and on health inequality/equity issues to the Camden LGA community resulting from future operation of WSI; and
- Update the Draft EIS to include all of the evidence (data) that supports the claims made regarding impacts on sleep disturbance (e.g. table 6.3 on page 103 of '*Draft EIS: Technical Paper 12 – Human Health*') and that sleep disturbance impact evaluation is expanded to other areas in the Camden LGA in addition to Cobbitty and Rossmore i.e. other impacted suburbs along the RRO flightpath.

Facilitated Changes

It is acknowledged that while operation of WSI will have 'flow-on effects' for other airports in the Sydney Basin, it is important these impacts are fully quantified and reflected in the Draft EIS. To this end, the following further action is required by the Australian Government.

Recommended that the Australian Government:

- Update the Draft EIS to include a 'plain English' explanation of the impacts that operation of WSI will have on small aircraft flights to/from Camden Airport, and



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whether these impacts will result in an increase in light aircraft noise adversely impacting Camden LGA residents;

- Determine the extent of increased noise impacts, pollution, the duration and operating timing for the 145 aircraft arrival movements to Bankstown Airport, and update the Draft EIS to quantify these impacts on the Camden LGA and any needed mitigation assessment required; and
- Review and update the Draft EIS to ensure the 'Facilitated Changes' analysis includes all potential impacts from aircraft movements associated with licensed civil and military airports, as well as all 'unlicensed' airports in operating proximity to WSI.

Cumulative Impacts

As part of the preparation of the Draft EIS for WSI, there is a prime opportunity for the Australian Government to prepare an updated EIS for the operation of KSA. To ensure an integrated operational approach between WSI and KSA, including the option to remove the curfew from KSA, the Australian Government should have regard to the following recommendation.

Recommended that the Australian Government:

- Review the Draft EIS, along with preparation of an updated EIS for KSA, to transparently quantify the cumulative impacts from operation of both airports on the Camden LGA and broader Western Parkland City.



Submission to Environmental Impact Statement – Western Sydney International Airport (January 2024)

Submission

Aircraft Noise

Key issues for the Camden LGA

1. Preliminary Flight Path Design – Impact on the Camden LGA

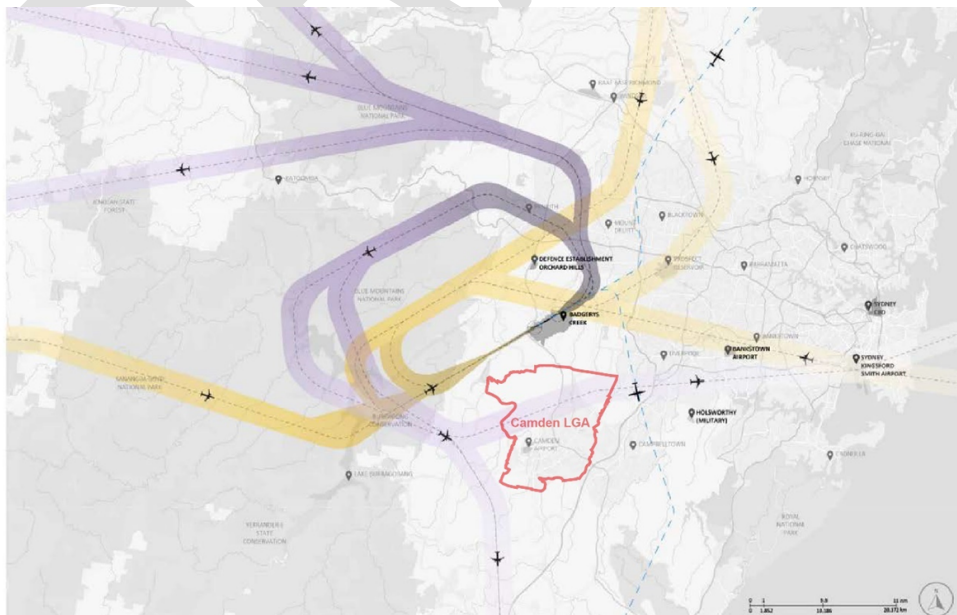
Reference is made to the following statement in the *Draft EIS – Part C: Environmental impact assessment*:

“Various operating strategies for managing aircraft noise will have differing impacts on different populations, particularly at night, when greater airspace flexibility and lower demand permits the use of different runway modes of operation and flight paths. This could be achieved by prioritising, when operationally possible, night-time flights over wedges of low-density rural land and natural areas to the south-west, west and south of WSI. However, it is noted that these areas could be more sensitive than urban areas experiencing similar levels of noise exposure”. (page 11-3 Part C: Environmental impact assessment)

Further to this statement in the Draft EIS, the “wedges” of land referred to that are south of WSI are located in the Camden LGA – most of which are proposed for future urban development. Following is an overview of the resulting adverse noise impacts for this part of the future Camden LGA community.

Runway 05

For the proposed daytime operation of WSI’s runway 05 (refer *Figure 1*), departing aircraft will take-off in a north-easterly direction (flight paths shown in purple), while arriving aircraft land from the south-west (flight paths shown in yellow).





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Figure 1: Runway 05 Day Arrivals and Departures (Source: Draft EIS: Part B – The Project (Sept 2023) p7-21)

Departing aircraft from Runway 05 will impact the northern half of the Camden LGA, across rural/residential areas of Cobbitty and existing/future rural/residential areas in Bringelly, Rossmore, Catherine Field and Leppington, albeit at a projected elevation upwards of 20,000 feet (6,000 metres).

For the proposed night operation of Runway 05, departing aircraft will take-off in a north-easterly direction, while arriving aircraft land from the south-west, as shown in Figure 2.

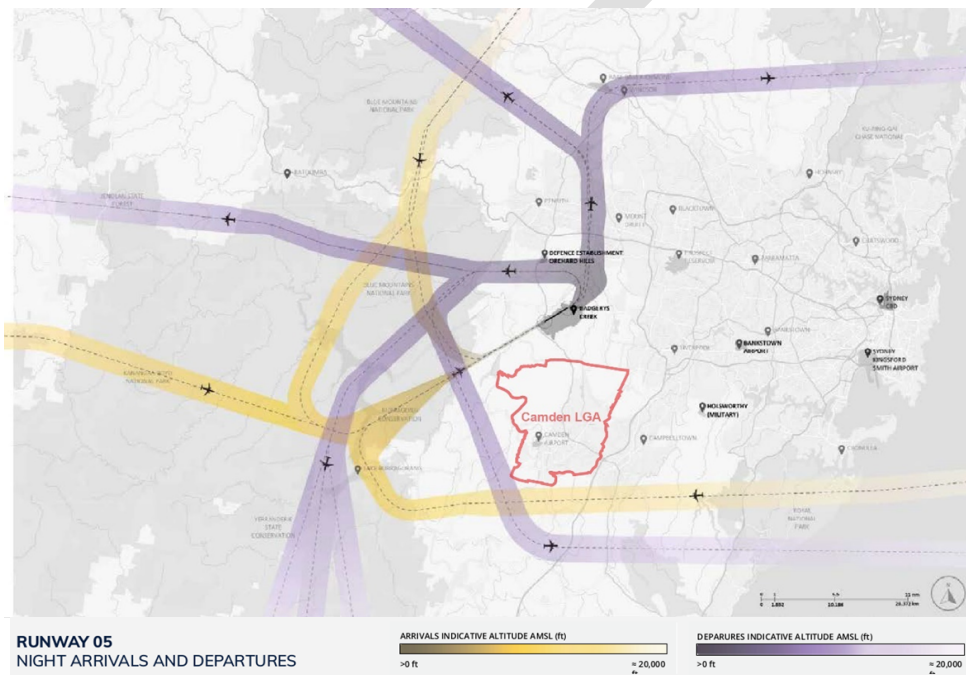


Figure 2: Runway 05 Night Arrivals and Departures (Source: Draft EIS: Part B – The Project (Sept 2023) p7-28)

While there is only marginal, direct impact on the Camden LGA from either arriving or departing aircraft for runway 05 at night-time, further comment regarding potential noise impacts associated with night-time flight paths is provided later in this submission.

Runway 23

Subject to prevailing wind conditions, the proposed daytime operation of Runway 23 would see aircraft take-off in a south-westerly direction, with arriving aircraft landing from the north-east (refer Figure 3).



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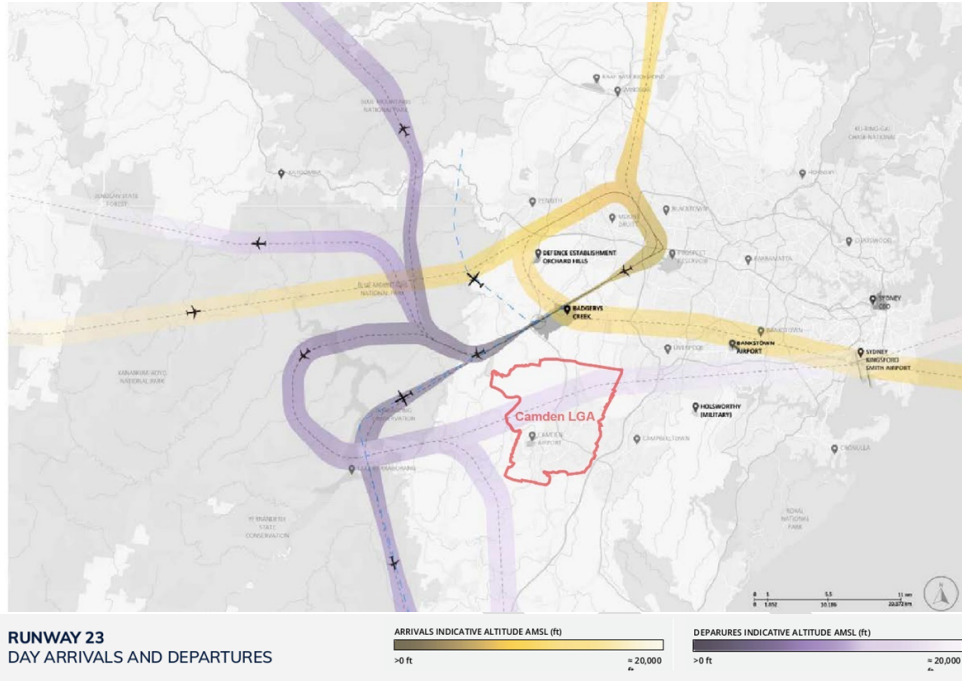


Figure 3: Runway 23 Day Arrivals and Departures (Source: Draft EIS: Part B – The Project (Sept 2023) p7-25)

The flight path alignment for Runway 23 is similar to aircraft departing from Runway 05, with projected impacts on the northern half of the Camden LGA, across rural/residential areas of Cobbitty and existing/future rural/residential areas in Bringelly, Rossmore, Catherine Field and Leppington.

For the proposed night operations for Runway 23, departing aircraft will take-off in a south-westerly direction, while arriving aircraft land from the north-east, as shown in Figure 4.

While there is no direct impact on the Camden LGA of either arriving or departing aircraft from runway 23 at night, further comment is provided regarding potential noise impacts associated with night-time flight paths as follows.



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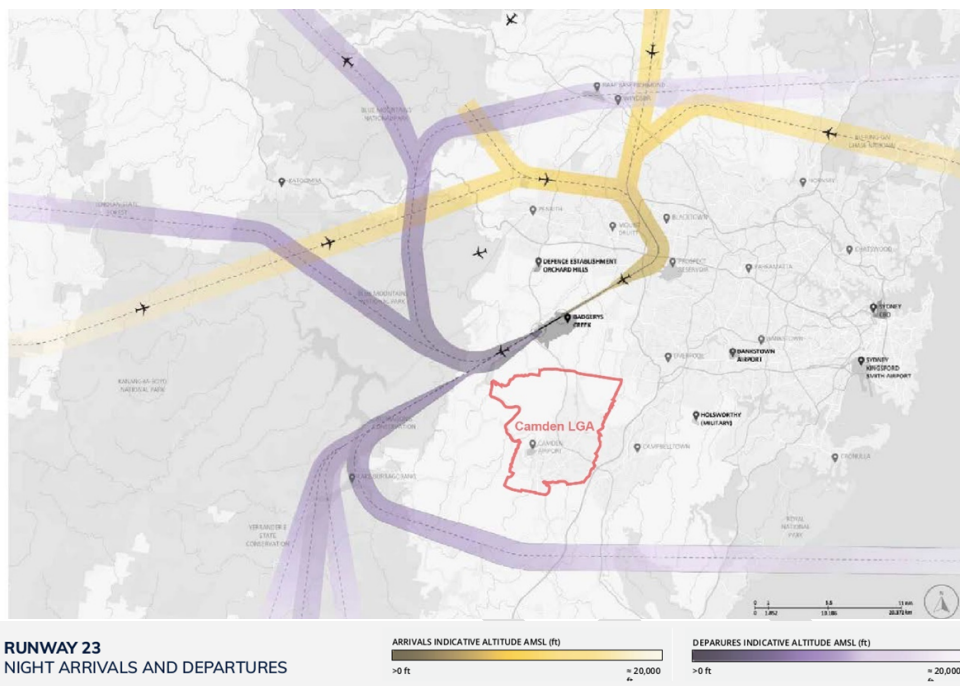


Figure 4: Runway 23 Night Arrivals and Departures (Source: Draft EIS: Part B – The Project (Sept 2023) p7-31)

Proposed RRO Flight Paths

The proposed RRO flight paths have the potential for considerable adverse impact on the Camden LGA. Subject to suitable weather conditions, between the hours of 11:00pm and 5:30am, aircraft would both take-off and land from the south-west, with the departure flight path impacting the full length of the western edge of the Camden LGA as shown in Figure 5.

In reference to the RRO runway option, the following points are noted as indicated in the Australian Government's WSI project brochure (June 2023):

- *The RRO runway mode may be utilised at night, when it is safe to do so, depending on suitable meteorological conditions and aircraft traffic levels. It positions aircraft manoeuvring at lower altitudes to the immediate south-west of the WSI, over the lower density rural and rural-residential zones.*
- *Aircraft departing to the south and east remain clear of Camden, The Oaks, Picton, Tahmoor and Wilton.*



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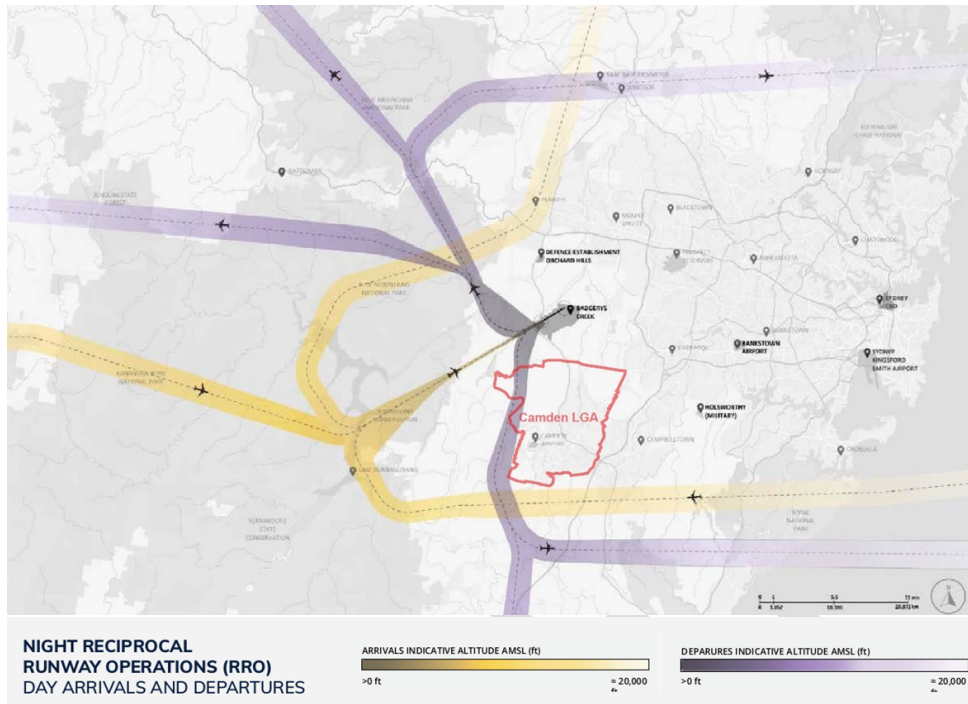


Figure 5: Night RRO Arrivals and Departures (Source: Draft EIS: Part B – The Project (Sept 2023) p7-34)

In contrast to the flight path alignment for departing aircraft from Runway 05 and Runway 23 impacting the Camden LGA upwards of 20,000 feet (6,000 metres), the RRO runway option is anticipated to impact the Camden LGA across a range of 2,500 feet (750 metres) up to 5,000 feet (1,500 metres).

Based on the Australian Government’s online ‘Aircraft Overflight Noise Tool’, this may result in aircraft noise impacts on the Camden LGA of between 60 decibels(dB) and 80dB between the hours of 11:00pm and 5:30am. Further comment on aircraft noise impacts from WSI is provided later in this submission.

There is cause to reflect on the level of the Australian Government’s awareness of the projected future population numbers for parts of the Camden LGA impacted by the RRO aircraft departure flight path option, based on their statement of the flight paths impact on “lower density rural and rural-residential zones” and reference to the avoidance of the smaller village settlements of Camden, The Oaks, Picton, Tahmoor and Wilton as points noteworthy of overall noise impact mitigation. In this regard, with reference to Council’s ‘ID Community Demographic Resource’, following are the forecast population numbers for the proximity areas that may be impacted by the RRO departure flight path, along the full length of the western edge of the Camden LGA;

Year	2026	2036
Forecast Population of Impacted Camden LGA Areas of the RRO flight path option	54,771	93,438
% Increase		70.5%



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This forecast increase in population within the first 10 years of operation of WSI highlights the potential impact aircraft movements will have on the Camden LGA community, an issue of concern raised with the Australian Government by Council and the community over a period of 25+ years.

2. WSI Flight Paths - Noise Impacts on the Camden LGA

As part of the cumulative noise measurement, the metric referred to as the ANEC (Australian Noise Exposure Concept) provides a general indication of aircraft noise impacts for land use planning purposes. However, the ANEC does not necessarily give a direct indication of all the aircraft noise experienced in proximity to operation of WSI.

Figures 6 and 7 show the ANEC contours for WSI, projected at its operation in 2033 and 2040 respectively.

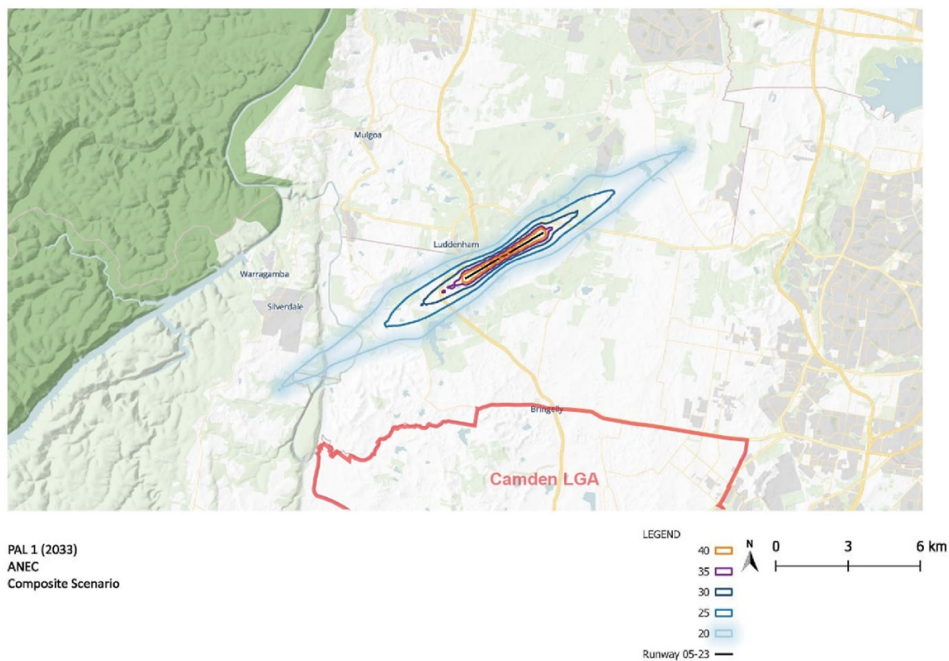


Figure 6: ANEC Noise Contours (2033) (Source: Draft EIS: Part C – Env Impact Assessment (Sept 2023) p11-76)



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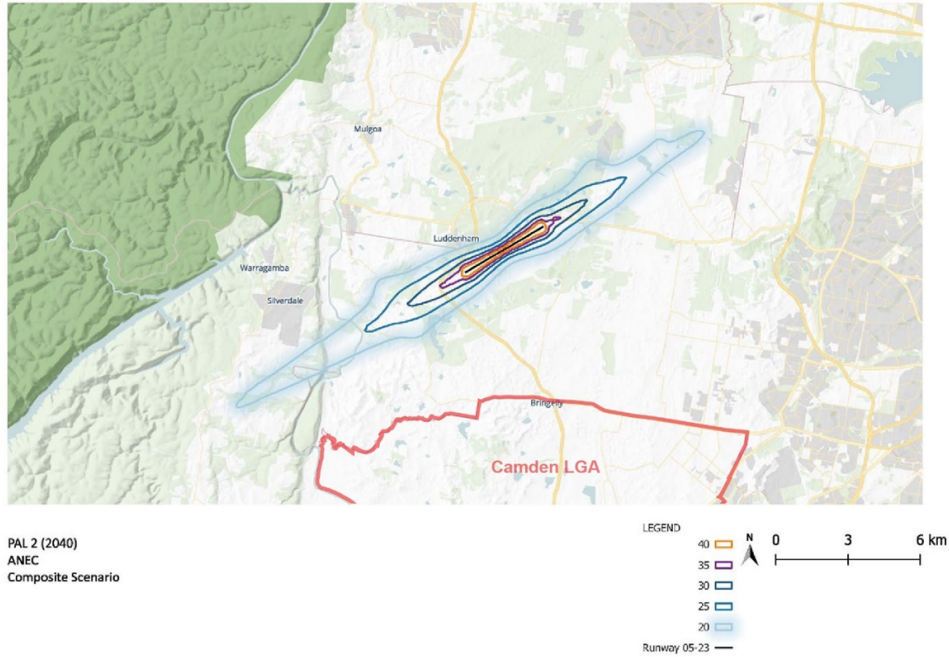


Figure 7 : ANEC Noise Contours (2040) (Source: Draft EIS: Part C– Env Impact Assessment (Sept 2023) p11-75)

While it is noted that the Camden LGA will not be directly impacted by the ANEC contours, *Figures 8 and 9* reflect the ‘N-above’ contours (N70 and N60) that depict the extent to which aircraft noise is expected to directly impact areas in the Camden LGA, in 2033 and 2040 respectively.

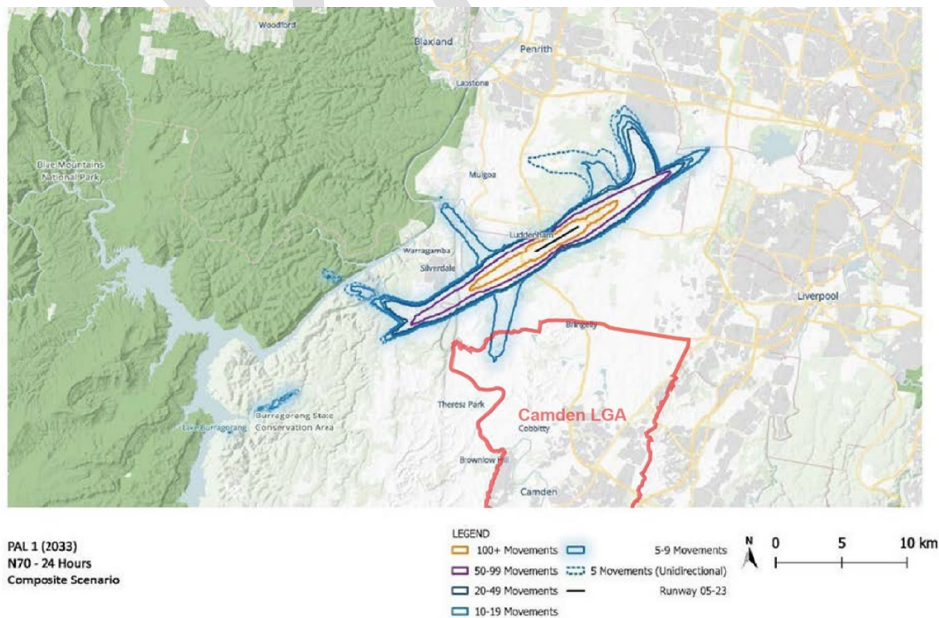


Figure 8: N70 Contours (2033) (Source: Draft EIS: Part C – Env Impact Assessment (Sept 2023) p11-40)



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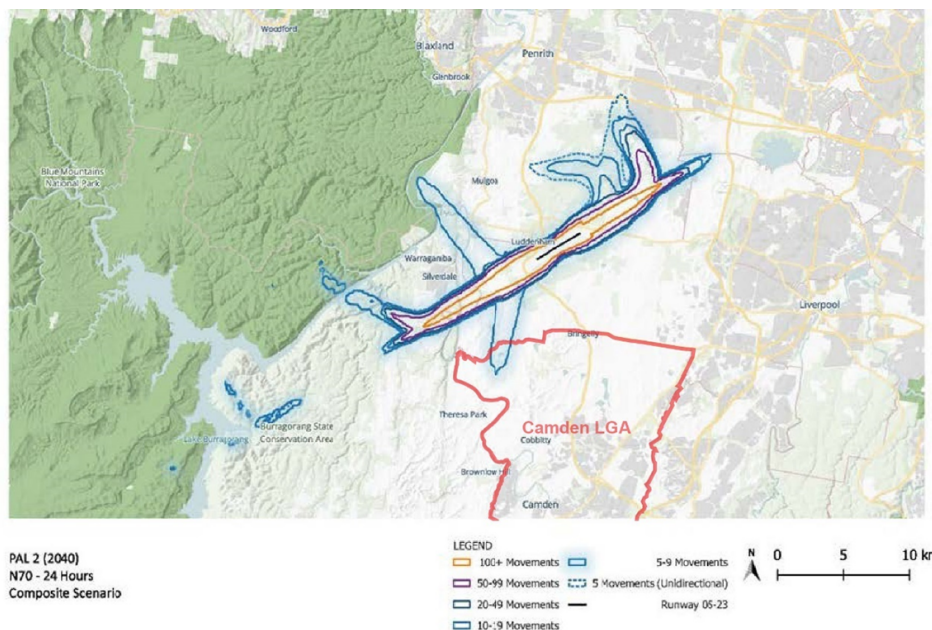


Figure 9: N70 Contours (2040) (Source: Draft EIS: Part C – Env Impact Assessment (Sept 2023) p11-39)

The 'N' contour measurement is based on the intensity and number of individual aircraft noise events experienced over an average 24-hour period and is presented in the measurement of decibels (dB). For example, N70 measures an aircraft noise outdoors of 70dB, which would reflect a typical noise level indoors of 60dB, a volume that would be considered loud enough to interrupt a normal conversation indoors.

It is noted that those areas in the Camden LGA that are directly impacted by the N70 contours to the year 2040 could be affected by aircraft overflights in excess of 70dB. This highlights the potential adverse noise impacts that certain parts of the Camden LGA will experience as a direct result of the preliminary flight paths for WSI.

While acknowledging that modelling projected impacts of aircraft noise from WSI is a complex process, the scale of the airport's future operation and the number of people potentially affected warrants further evaluation by the Australian Government.

For example, as referenced earlier in this submission, the proposed night-time operation of the RRO has the potential to adversely impact residents in the Camden LGA. During the RRO's hours of operation (11:00pm to 5:30am), there are lower levels of ambient (background) noise against which the sound of aircraft operating at an estimated 60dB to 80dB would be heard. In contrast, the World Health Organisation's (WHO) 'Compendium of WHO and other UN guidance on health and environment (2022 update)' (Ch11.Page2) notes that the recommended levels for night noise exposure, for aircraft noise, is 40dB.

Given the disparity between the forecast of night flights of 60dB-80dB over the Camden LGA compared to the WHO's recommended 40dB for night-time aircraft noise, a quantitative analysis of this potential risk is recommended to appropriately inform the Draft EIS.



3. WSI Flight Paths – Management Strategies

As part of finalising the WSI flight path design prior to operations commencing in 2026, it is recommended that the following airspace management strategies for minimising aircraft noise impacts on the Camden LGA are considered by the Australian Government:

- Overflight avoidance;
- Overflight dispersion; and
- Overflight mitigation procedures.

Overflight Avoidance

Typically the preferred method of managing aircraft noise intrusion is to avoid overflying sensitive locations at a noise level which is audible, such as existing and future residential areas in the Camden LGA. While there are practical challenges to implementing this strategy in all instances, redirected flights will have impacts in other potentially sensitive locations and these alternative impacts must be weighed against the benefits afforded to the areas that are avoided. It is recommended to identify areas of community amenity and locations where avoidance of overflight should be prioritised.

The extent of the areas to be ideally avoided is therefore likely to be large. Nonetheless, the most sensitive areas should be identified with consideration to the following:

- Typical sensitivity of use (e.g. residential areas including for sleep, education facilities and areas sought after for their natural heritage, character and environment, as in the case of RRO impacts on the Camden LGA);
- Existing background/ambient noise levels;
- Areas of remoteness from transportation and other anthropogenic noise sources; and
- Consultation with relevant stakeholders, including where flight paths are over national park areas.

As well as avoidance of locations, consideration should be given to how avoidance of sensitive time periods could be practically implemented e.g. for the RRO option impact on the Camden LGA – in terms of sensitive times of the day (such as night time sleep periods), as well as potential weekly and seasonal changes in sensitivity associated with time of use.

Overflight Dispersion

Where aircraft overflight of sensitive areas cannot be practically avoided, flight tracks are recommended to be dispersed across the widest practical range to avoid concentration of audible aircraft overflights in particular areas, and to maximise the period between audible aircraft overflights at any given location.



Overflight Procedures

Where aircraft overflight of sensitive areas cannot be practically avoided, flight procedures should be selected to reduce the noise experienced at ground level. These procedures should be considered for urban areas given their proximity to WSI:

- Flight routing in combination with departure and arrival procedures which enable the aircraft to reach or maintain the greatest possible altitude over sensitive areas; and
- Adoption of reduced thrust (engine power) procedures and maximising altitude of overflights where safety permits e.g. for arriving aircraft, the adoption of constant descent procedures, and for departing aircraft, climb straight along the runway centreline as far as practical before turning to their destination. However, assessing these procedures will require a trade-off, i.e. while reducing thrust leads to reducing noise levels, there is the potential to increase the duration that the aircraft event is audible.

4. WSI Flight Paths – Deference to KSA

Council is of the understanding that as per the Draft EIS, preliminary design of the flight paths for WSI is based on not impacting existing operations of the broader Sydney Basin airspace. As a consequence, the preliminary WSI flight paths have been designed separate to existing Sydney Basin airspace flight paths, including deference to flight paths for Sydney (Kingsford Smith) Airport (KSA). The exceptions are the proposed alternative flight path options during KSA curfew hours (night-time defined, 11:00 pm to 5:30 pm), noting less congestion/constraint.

Retention of the night-time curfew for KSA, while WSI is operated 24-hours, creates a situation where local impacts from the operations of the two international airports are managed inequitably. Such an approach reinforces the social divide in the Greater Sydney Region and further adds to the well documented inequities between Sydney's east and west.

As the currently proposed WSI preliminary flight paths are planned to not impact existing flight paths, there is an opportunity to consider a holistic approach to the broader Sydney Basin airspace flight path design, such that potential noise impacts around WSI could be mitigated further.

It is imperative that the Australian Government revisit the entire Sydney Basin airspace design, including preparation of an updated EIS for KSA inclusive of options for its 24-hour operation, to ensure an equitable management of aircraft movements for all residents in the Greater Sydney Region.

5. KSA Operating Hours

Further to the previous point regarding the Australian Government's deference to KSA operations when designing WSI flight paths, reference is made to the issue of time



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definitions for airport operations i.e. a 24-hour period, versus the parameters of a Day/Night period.

The Draft EIS adopts a Day period definition as 5:30am to 11:00pm and the Night period 11:00pm to 5:30am, to align with KSA's curfew hours, although it acknowledges that actual hours can vary. However, the night defined hours that form the basis of the Draft EIS impact assessment do not strictly align with industry standard/accepted practice for describing aircraft noise impacts.

For example, the 'National Airports Safeguarding Framework' (NASF) considers the number of night-time aircraft noise events for a period, defined as 11:00pm to 6:00am. It is acknowledged that the NASF proposes the use of these supplementary metrics for defining the extent of aircraft noise around airfields and assists in land use planning decisions for rezoning of greenfield areas and brownfield areas to permit noise sensitive uses, and assessment of new development applications for noise sensitive uses within existing residential areas.

It is important to note that the night definition in the Draft EIS does not align with thresholds typically used for the assessment of impacts such as sleep disturbance (i.e. L_{night}). This metric adopts a broader night defined period of 8 hours between 11:00pm and 7:00am.

Based on these points it is evident that, when measuring the impacts associated with sleep disturbance from night-time aircraft movements, the Draft EIS has mis-represented the results by altering the parameters of measurement. That being, rather than use the NASF i.e. industry standard, the Australian Government has prioritised KSA's curfew operating hours over the health and wellbeing of residents in the Western Parkland City and Camden LGA community.

6. Noise Insulation and Property Acquisition Policy

In the Draft EIS the Australian Government have indicated their intention to develop a 'Noise Insulation and Property Acquisition' (NIPA) policy for properties affected by aircraft overflight noise resulting from the future operation of WSI.

The NIPA Policy identifies the opportunity for property owners located in the ANEC 20 contour area to have their land acquired by the Australian Government. The ANEC 20 contour area is depicted in *Figure 10*.



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Government refer a copy of the *'Draft Environmental Impact Statement: Technical Paper 1 - Aircraft Noise'* to the Ombudsman for assessment.

Based on the previously noted key issues for the Camden LGA regarding the WSI Draft EIS, the following recommendations are made for action by the Australian Government.

Recommended that the Australian Government:

- Acknowledge that a growing future population projected of up to 100,000 additional residents (by 2036) in adjacent areas of the Camden LGA may be negatively impacted by the 'Reciprocal Runway Operations' (RRO) for WSI, and that the Draft EIS is amended to reflect that the RRO option has the potential for the greatest adverse impact on the Camden LGA community and identifies actions for mitigation that are enforceable on the future operators of WSI;
- Ensure that any RRO flight path option is following recommended levels for night noise exposure of 40dB for aircraft noise, as per the World Health Organisation's (WHO) *'Compendium of WHO and other UN guidance on health and environment (2022 update)'* (Ch11. Page2);
- Review the WSI flight path design in developing the following airspace management strategies for minimising aircraft noise impacts on the Camden LGA;
 - Overflight avoidance;
 - Overflight dispersion; and
 - Overflight mitigation procedures.
- Revisit the Sydney Basin airspace design, including preparation of an updated EIS for KSA inclusive of options for its 24-hour operation, to ensure an equitable management of aircraft movements for all residents in the Greater Sydney Region;
- Review and update the Draft EIS to ensure that all measurements/analysis of night-time aircraft movements are based on the metrics used for sleep disturbance i.e. 11:00pm to 7:00am;
- Refer a copy of the *'Draft Environmental Impact Statement: Technical Paper 1 - Aircraft Noise'* to the Aircraft Noise Ombudsman for assessment; and
- Ensure the scope of the NIPA Policy is expanded to include those land owners in the Camden LGA that are directly impacted by aircraft noise from the future operation of the WSI dual runway option e.g. in the N70 contour areas.

Air Quality

Key issues for the Camden LGA

1. A Right to Clean Air



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The World Health Organisation (WHO), an institution within the United Nations system that promotes health, human safety and service to the vulnerable, makes the declaration that “*Clean air is a basic human right*”, depicted as follows:

The screenshot shows the WHO website header with navigation links: Health Topics, Countries, Newsroom, and Emergencies. The main heading is "What are the WHO Air quality guidelines?". Below the heading is the sub-heading "Improving health by reducing air pollution." and the date "22 September 2021". The article text includes:

What are the WHO Air quality guidelines?

The World Health Organization's Air quality guidelines (AQG) serve as a global target for national, regional and city governments to work towards improving their citizen's health by reducing air pollution.

Why does WHO publish Air quality guidelines?

Clean air is a basic human right. Yet, air pollution continues to pose a significant threat to people worldwide - it is the greatest environmental threat to health and a leading cause of non-communicable diseases (NCDs) such as heart attacks or stroke. According to the World Health Organization, there are 7 million premature deaths every year due to the combined effects of outdoor and household air pollution- with millions more people falling ill from breathing polluted air. More than half of these deaths are recorded in developing countries.

WHO regularly integrates scientific evidence on air pollution's health impacts as well as monitors countries air quality progress. The recommendations included in the WHO Air quality guidelines are based on systematic literature reviews and subsequent rigorous evaluation methods as well as extensive consultation with experts and end-users of the guidelines from all regions of the world.

Figure 11: Source: [What are the WHO Air quality guidelines?](#)

In serving the best interests of vulnerable communities around the World, the WHO have developed 'Air Quality Guidelines' with the objective of reducing adverse health impacts resulting from the propagation of air pollution. It is important to note that the WHO's air quality guidelines incorporate actual scientific evidence from multiple countries around the World, making them relevant to the assessment of adverse air quality impacts resulting from projects such as the operation of WSI, and supporting a rationale for adherence on air quality management.

As an example of their role in representing vulnerable communities, the WHO's air quality guidelines recommend levels and targets for common air pollutants, such as 'Fine Particulate Matter' (PM). In this regard, following is an extract of the WHO's air quality guidelines as it relates to PM;



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Table 3.26. Recommended 2021 AQG levels and 2005 air quality guidelines

Pollutant	Averaging time	2005 air quality guideline	2021 AQG level
PM _{2.5} , µg/m ³	Annual	10	5
	24-hour ^a	25	15
PM ₁₀ , µg/m ³	Annual	20	15
	24-hour ^a	50	45

Figure 12 - Source: WHO Global Air Quality Guidelines (p.136) [9789240034228-eng.pdf \(who.int\)](https://www.who.int/publications/m/item/9789240034228-eng.pdf)

The highlighted numbers in *Figure 12* reflect the WHO's 2021 guidelines for air quality, based on both an annual and 24-hour average measurement of air quality.

In contrast, the '*Draft EIS: Technical Paper 2 – Air Quality*' has projected the PM outputs resulting from operation of WSI as follows;

Table 6.13 Summary of cumulative PM_{2.5} concentrations for 2055 (µg/m³)

	24-hour average		Annual average	
	Prefer Runway 05	Prefer Runway 23	Prefer Runway 05	Prefer Runway 23
Max value at residential receptors	1.28	1.42	0.29	0.32
Estimated contribution at equivalent residential receptor location due to ground-based operations from the 2016 EIS	2.22	2.22	0.33	0.33
Background level	21	21	7.6	7.6
Cumulative level	24.5	24.6	8.2	8.3
Criterion	25	25	8	8

Table 6.14 presents a summary of the predicted cumulative PM₁₀ concentrations for 2055. The results indicate the predicted cumulative 24-hour average and annual average levels are below all relevant criteria.

Table 6.14 Summary cumulative PM₁₀ concentrations for 2055 (µg/m³)

	24-hour average		Annual average	
	Prefer Runway 05	Prefer Runway 23	Prefer Runway 05	Prefer Runway 23
Max value at residential receptors	1.28	1.42	0.29	0.32
Estimated contribution at equivalent residential receptor location due to ground-based operations from the 2016 EIS	4.18	4.18	0.63	0.63
Background level	43.5	43.5	18.8	18.8
Cumulative level	49.0	49.1	19.7	19.8
Criterion	50	50	25	25



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Figure 13: (Source: Draft EIS: Technical Paper 2 - Air Quality p.75 (Sept 2023))

The highlighted numbers in *Figure 13* demonstrate that the Australian Government have determined that an acceptable criterion measurement for operation of WSI is in-excess of the WHO's 2021 air quality guidelines, for the 24-hour and annual average.

A comparison between the WHO's 2021 guidelines for air quality, and the Australian Government's projection of PM impacts on air quality resulting from WSI, are summarised as follows:

	24-hour Average		Annual Average	
	Runway 05	Runway 23	Runway 05	Runway 23
Draft EIS Cumulative Level PM _{2.5}	24.5	24.6	8.2	8.3
WHO Guidelines _{2.5}	15	15	5	5
Draft EIS Cumulative Level PM ₁₀	49.1	49.1	19.7	19.8
WHO Guidelines ₁₀	45	45	15	15

This comparison highlights that on both the 24-hour and annual average, for the PM_{2.5} and PM₁₀ criterion, operation of WSI will generate air quality that is in breach of the WHO's global air quality guidelines.

A salient point arising from this comparative analysis is the omission by the Australian Government from the Draft EIS of the 24-hour and annual average data for the proposed WSI Reciprocal Runway Operation (RRO). As noted earlier in this submission, the RRO option has the potential for the greatest adverse impact on the Camden LGA community, and yet the aforementioned data referenced in the Draft EIS presents no evidence of air quality analysis of aircraft movements to/from WSI via the RRO; an option that will have a direct adverse impact the Camden LGA.

In light of these significant omissions by the Australian Government it is recommended that the '*Draft EIS: Technical Paper 2 – Air Quality*' is reviewed to ensure;

- It adheres to the WHO's 2021 'Global Air Quality Guidelines', in maintaining the basic human rights of the Camden LGA community, of access to clean air;
- That any approval of the flight paths and endorsement of the Draft EIS includes the provision that stipulates an ongoing requirement for the WSI operator to monitor air quality in perpetuity, and that WSI's operation is managed to ensure that air quality standards are always maintained in accordance with the WHO's Global Air Quality guidelines; and
- That the Draft EIS for WSI is updated to include analysis of PM_{2.5} and PM₁₀ data for the RRO, in light of the fact that this runway option is likely to have the most adverse impact on the Camden LGA community.



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2. Inadequate Air Quality Mitigation Management

As noted in the previous key issue for the Camden LGA regarding air quality, the Australian Government have mis-represented the adverse impacts to air quality for the Camden LGA community from future operation of WSI, through reliance on flawed data. In this regard, the following highlighted statement noted in the Draft EIS is mis-leading;

Air quality and greenhouse gas

No project specific air quality or greenhouse gas emissions mitigations are proposed.

As this assessment did not identify any significant change in the approved ground level impacts per the 2016 EIS, no additional monitoring for aircraft emissions is required.

Figure 14: (Source: Draft EIS – Part D: EIS Synthesis p.24-7 (Sept 2023))

Any claim that monitoring for aircraft emissions is not required is mis-represented on the basis the measurement criterion relied upon by the Australian Government is so high, that it is considered out-of-date by current standards and exceeds a baseline criterion determined by the WHO.

Council's previous submission to the Australian Government 2015 Draft EIS for the WSI Stage 1 Airport Plan identified a range of significant air quality and greenhouse gas emission issues expected to have an adverse impact on the Camden LGA community. To date, Council has received no response from the Australian Government on any of the points raised in its submission to the 2015 Draft EIS.

To ensure the integrity of the environmental impact assessment prepared for WSI, it is recommended that the Australian Government review the Draft EIS to include a comprehensive mitigation management strategy for air quality, and that this imperative is reflected via the ongoing monitoring of aircraft emissions on the part of the Australian Government.

3. Pollutant Risk Estimates

Given the significance of the potential for adverse impacts to the Camden LGA community from pollutants to air quality resulting from operation of WSI, it is recommended that risk estimates are conducted for multiple periods up to the capacity year 2055 (e.g. 2033, 2038, 2045, 2050) and that they are done so separately for each air pollutant.

Risks should also be provided for the entire assessment period e.g. 30+ years and not just for the interim snapshot periods. Discussion of the uncertainty around estimates could be enhanced for example, through the use of the upper and lower 95% confidence interval values of the exposure-response coefficients used. This would provide a better understanding of the likely range of actual impacts, for any 'worst-case', unmitigated scenario.

Without the extent of the aforementioned analysis the Draft EIS relies on such statements as:



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“...and it is likely there will be improvements in fuel efficiency (for aircraft and motor vehicles) and decreases in aircraft emissions in the future, it is reasonable to conclude that no significant impacts arise”.

No justification is provided as to how or when such fuel efficiency improvements can/will be attained, particularly for aircraft, which undermines the claim that it is ‘reasonable’ to make any such conclusion, at the risk of future air quality (and in turn, adverse health impacts) for the Camden LGA community.

An overview of the expected scale of impacts resulting from the combined effect of all air pollutants should be provided in a revised Draft EIS to provide a picture of the total air quality risk to the exposure of the Camden LGA community, in 2055.

4. Sensitive Receptors

The Draft EIS provides no discussion of the implications as to the distribution of effects for inequity through baseline information, on the sensitive/vulnerable groups impacted by WSI’s operation (i.e. Chapter 4 of the *‘Draft EIS: Technical Paper 2 – Air Quality’*). For example, community feedback and any potential perceptions or concerns of residents in the Camden LGA community are not discussed.

The section on Air Quality in the Draft EIS requires amendment to reflect community feedback on health concerns and should describe how this feedback was considered and addressed in the assessment. Where community comments have not been incorporated or addressed, an explanation justifying this should also be presented. In the event there were no specific comments or concerns about health impacts/effects then this should also be stated explicitly. There should also be discussion of how communities were consulted regarding potential impacts on health, specifically as it relates to air quality. For example, perception effects are different from biological or epidemiological risks, as they can cause stress and anxiety, and should be considered separately from mortality and morbidity effects.

A key point of concern for the Camden LGA community is the under-representation of the ‘sensitive receptor’ locations where our existing and future residents will live. For example, *Figure 15* reflects a map from the *‘Draft EIS: Technical Paper 2 - Air Quality’*.



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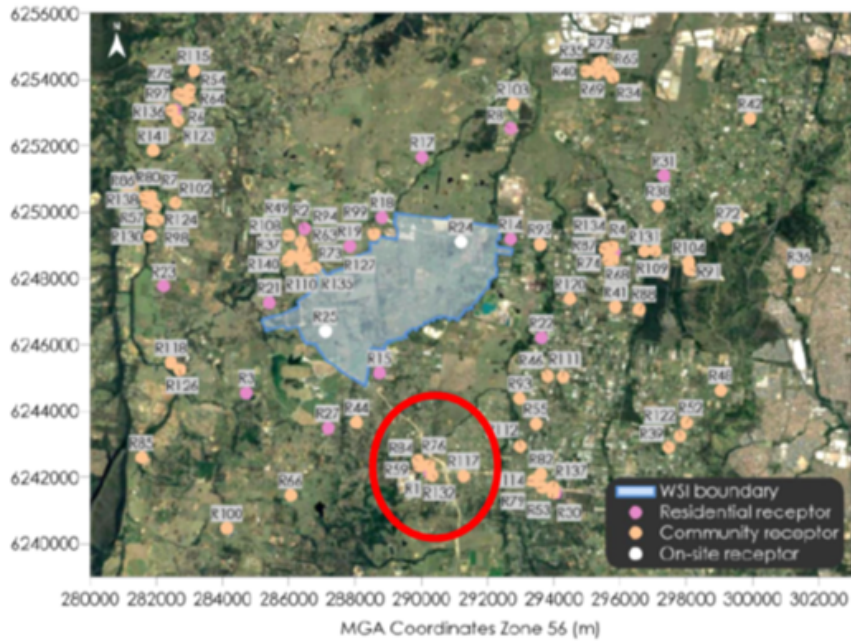


Figure 4.1 Location of sensitive receptors assessed

Figure 15: Location of sensitive receptors in the Camden LGA (Source: Draft EIS: Technical Paper 2 - Air Quality p.33 (Sept 2023))

The low-quality standard of this map as it appears in the Draft EIS makes it difficult to analyse, however the sensitive receptors depicted within the 'red circle' area in *Figure 15* appear to be located within the Camden LGA. While data is listed in Technical Paper 2 for other sensitive receptors depicted in *Figure 15*, there is no data listed for the sensitive receptors located in the Camden LGA.

It would be reasonable to state that air movement, and in turn air quality, is not beholden to lines on a map such as depicted in *Figure 15*. Air movement in the Sydney Basin is circular – moving west on the prevailing wind during the day, draining northward down the valleys at night, eastward to the coast in the early morning then returning back inland. Because of this circular pattern, parcels of air become entrained in the flow, the same parcels crossing back over the metropolitan area, accumulating pollutants and returning the following day to the Hawkesbury Basin. During times of stable weather, and when temperature inversions occur, this cycle can go on for days or weeks with pollutants either emitted within the basin or transported into it from the east retained rather than dispersed. Thus the capacity of the Hawkesbury Basin to assimilate pollutant emissions is less than that of the eastern sectors.

The Camden LGA comprises an area of land approximately 206km², the greater part of which lies within a topographic area known as the Camden Basin. This Basin lies within the Hawkesbury Basin and is bounded on the north by a series of low hills to the west of South Creek (near the proposed airport site) and on the west, east and south by the 100m contour. While of only shallow depth (approximately 40m) the Camden Basin is an important sub-region in local air quality considerations because of its ability to trap and inhibit the dispersion of low-level air emissions.



The Camden Basin is subject to extremely stable air conditions at night resulting from deep, strong temperature inversions and is completely decoupled from the flow of air above, thus allowing trapped air to deteriorate within the Basin until the inversion has lifted and sufficient wind flow occurs to displace it.

In the absence of clear analysis in the Draft EIS on this issue, it may be reasonable to conclude that an accurate picture of what happens with air chemistry, and in fact air quality as a whole, within the Camden Basin has still not yet been established via the Draft EIS for WSI.

Consequently, in the absence of measurements via sensitive receptors for the Camden LGA, the Draft EIS requires further update in actually providing such data, including an outline of proposed mitigation measures (i.e. an air quality management framework or plan), which should be provided in the health chapter along with an explanation for how and to what extent these measures will mitigate the identified adverse health impacts.

5. No Prescribed Limits on Air Quality Impacts

The Draft EIS provides no assurances that acceptable Air Quality thresholds will not be breached, nor does it set hard limits on the resulting environmental impacts. In general, as with many of the other environmental elements assessed under the Draft EIS, Air Quality mitigation measures are not prescribed other than via a hope for improvements through technological advancement, resulting in little in the way of firm parameters on mitigating adverse impacts. This may well be as a result of the Australian Government seeking greater flexibility over the management of Air Quality resulting from the operation of WSI. However, this is little comfort to the existing and future Camden LGA community that will have to endure a diminished quality of life as result of exposure to poor Air Quality in the area where they live, work and play.

In expanding on the recommendation for updating the Draft EIS to include data from sensitive receptors in the Camden LGA, parameters are required on the extent of acceptable Air Quality resulting from the operation of WSI i.e. a limit of acceptable Air Quality is required that, when breached, would require the WSI operator to cease aircraft movements until such time as acceptable Air Quality limits are restored. Management strategies in response could include temporary diversion of aircraft flights to Sydney Kingsford-Smith Airport, regardless of the time, day or night.

6. Lack of Transparency on Air Quality Data

For all adversely impacted stakeholders affected by the future operation of WSI, the integrity of data relied upon in the environmental impact assessment is paramount; and in turn, so too is the provision of access to this data.

Regarding the Air Quality data referenced in the environmental impact assessment and '*Draft EIS: Technical Paper 2 - Air Quality*', access to all relevant input and output files that were integral to developing the reports is crucial; however, these were not provided by the Australian Government. The provision of such information is an industry expectation and is a minimum requirement of the NSW Environment Protection Authority (EPA) for such



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studies. For any practical peer review of Air Quality impacts resulting from WSI, data is integral to demonstrating the integrity of the environmental impact assessment.

It is crucial for the Australian Government to promote transparency in their engagement with the Camden LGA community, regarding the environmental impacts associated with Air Quality resulting from operation of WSI. As the Australian Public Service Commission states:

“Trust in government is declining in many countries. Trust is important for ensuring success of government programs. Lack of trust compromises the willingness of citizens and business to respond to public policies and contribute to a sustainable economic recovery.”

“Openness of government, transparency around decisions, and management of information are all key drivers of public trust.”

Source: [Chapter 2: Transparency and integrity | Australian Public Service Commission \(apsc.gov.au\)](https://www.apsc.gov.au/chapter-2-transparency-and-integrity)

For the Australian Government to earn the trust of all affected stakeholders in the WSI project, access to all the corresponding data relating to Air Quality, and other background studies conducted in preparing the environmental impact assessment, is needed for evaluation as part of the public exhibition process for the Draft EIS.

7. Anomalies in Draft EIS Technical Paper 2 - Air Quality

In evaluating the Draft EIS assessment on Air Quality impacts resulting from operation of WSI, the presentation of information in ‘*Draft EIS: Technical Paper 2 - Air Quality*’ in part may impede the comprehension of affected stakeholders. For example there is no clear mapped depiction of the extent of the ‘local study area’, or the ‘regional study area’, as it applies to the critical issue of Air Quality.

Notwithstanding, while ‘*Technical Paper 2 - Air Quality*’ does not indicate the area of the ‘regional study’, it does depict the ‘local study area’ mapped as follows:



1.4 Study area

1.4.1 Local study area

The WSI is located approximately 15 kilometres south-southeast of Penrith and approximately 20 kilometres east of Liverpool. The existing land use surrounding WSI consists of a mixture of low density residential and rural properties.

Figure 1.8 presents a 3-dimensional visualisation of the terrain features surrounding WSI. Please note that the regional assessment study area is significantly larger and is described in other sections, for example refer to Appendix B or Figure 5.9.

The topography of WSI and immediate surroundings is gently undulating with decreasing elevation to the east and southeast towards Thompsons Creek. Outside of WSI there are elevated ridges to the southwest and northwest. To the east of the site the terrain remains relatively flatter with some slight undulations. The Blue Mountains are to the west with the terrain becoming elevated and complex to the west of the north flowing riverine channel.

The terrain features of the surrounding area influence the local wind distribution patterns and flows which are important for the dispersion and propagation of air emissions.

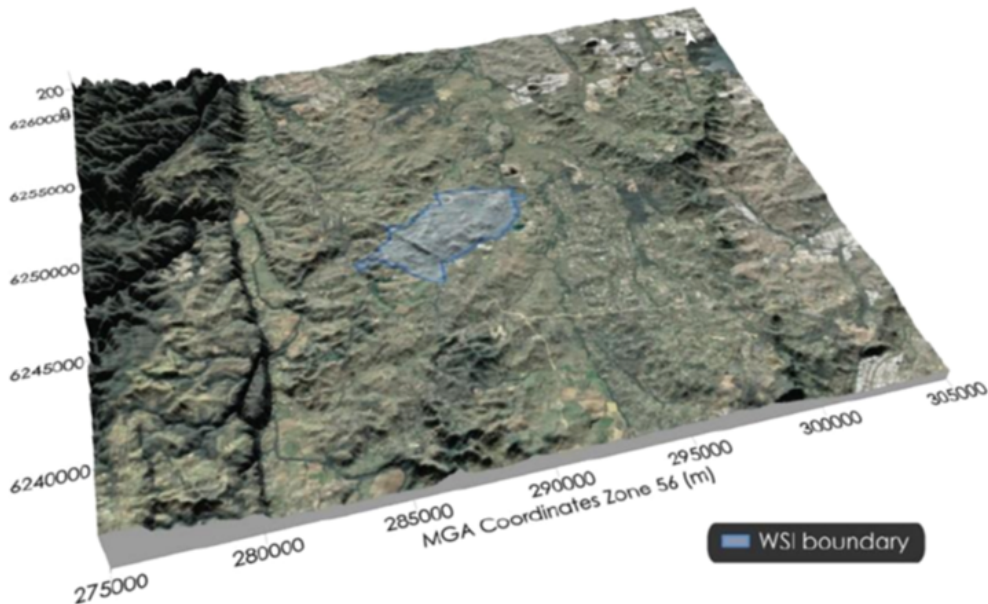


Figure 1.8 Representative visualisation of the local topography

Figure 16: (Source: Draft EIS: Technical Paper 2 - Air Quality p.13 (Sept 2023))

This is a poor-quality map presented in *'Technical Paper 2 - Air Quality'*, with no geographical indicators to provide spatial context of the 'local study area'; this resource reference is inadequate in light of the significant information it is meant to relay. Further, the accompanying highlighted text in the Paper describes the WSI site as located "approximately 20 kilometres east of Liverpool" (page 13, Draft EIS: *'Technical Paper 2 - Air Quality'*).

In retaining the confidence of affected stakeholders in the WSI project, it is imperative that the Australian Government demonstrates a good understanding as to the extent of the Air Quality impacts resulting from the operation of the Airport, up to and including its actual geographical location relative to Liverpool. In this regard, *'Technical Paper 2 - Air Quality'* requires correction and clarification of the actual spatial parameters of the 'local study area'



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and 'regional study area', as they apply to this environmental impact assessment of Air Quality.

Recommended that the Australian Government:

- Review the *'Draft EIS: Technical Paper 2 – Air Quality'* for WSI to ensure;
 - It adheres to the World Health Organisation's (WHO's) '2021 Global Air Quality Guidelines', in maintaining the basic human rights of the Camden LGA community of access to clean air;
 - That any approval of the flight paths and endorsement of the Draft EIS includes the provision that stipulates an ongoing requirement for the Australian Government to monitor air quality in perpetuity, and that the WSI's operation is managed to ensure that air quality standards are always maintained in accordance with the WHO's Global Air Quality guidelines; and
 - That the Draft EIS for WSI is updated to include analysis of PM_{2.5} and PM₁₀ data for the RRO, in light of the fact that this runway option is likely to have the most adverse impact on the Camden LGA community.
- Review the Draft EIS to include a comprehensive mitigation management strategy for air quality, and that this imperative is reflected via the ongoing monitoring of aircraft emissions on the part of the Australian Government;
- Conduct risk estimates for multiple periods up to the capacity year 2055 (e.g. 2033, 2038, 2045, 2050), that they are done so separately for each pollutant, and that the Draft EIS is updated to reflect this analysis;
- Update the Draft EIS to reflect actual data from sensitive receptors located in the Camden LGA, along with further analysis including community feedback on health concerns and describe how this feedback was considered and addressed in the assessment, in developing an Air Quality Management Framework/Plan for the Camden LGA, South Western Sydney and Western Sydney;
- Update the Draft EIS to establish parameters on the extent of acceptable Air Quality resulting from the operation of WSI, and limit WSI's operation subject to the maintenance of those acceptable Air Quality parameters;
- Actively promotes transparency in its public consultation on the WSI Draft EIS, by making available all background studies on issues such as Air Quality, as well as the other components that form part of the overall environmental impact assessment; and
- Accurately map the 'local study area' and 'regional study area' for Air Quality in the Draft EIS, and conduct a review of *'Technical Paper 2 - Air Quality'* to correct all anomalies.



Greenhouse Gas Emissions

Key issues for the Camden LGA

1. Monitoring Greenhouse Gas Emissions

As a consequence of the generation of greenhouse gas emissions catalysed by the Australian Government's creation of the WSI project, as noted in the Draft EIS 'Part C: Environmental Impact Assessment', in 2033 flights from WSI's anticipated route network are predicted to emit around 1.8 million tonnes of CO₂e; in 2055, emissions are predicted at 8.65 million tonnes.

In mitigating the significant generation of greenhouse gas emissions resulting from the operation of WSI, the Australian Government's response states that while *"there are many available options to minimise the emissions of CO₂e from aircraft engine use"...* *"many of these are outside of the control of this project"* (p.12-38: 'Part C: Environmental Impact Assessment').

One option that is available to the Australian Government, which will assist in meeting its obligations under 'The Paris Agreement' (a legally binding international treaty on climate change), is to actively monitor and mitigate greenhouse gas emissions for WSI. However, the Draft EIS states the following;

"No project specific greenhouse gas emissions mitigations or monitoring is proposed".

This approach stated in the Draft EIS is in contrast to the Australian Government's commitment to climate change, and pledge to reduce greenhouse gas emissions by 43% below 2005 levels by 2030. [Australian Government Climate Change commitments, policies and programs \(aofm.gov.au\)](https://www.aofm.gov.au) It is not clear how the Australian Government would attain such targets if they were proposing to not establish mitigation and monitoring systems on a greenhouse gas emitting project of their own making i.e. WSI.

The significance criteria for Greenhouse Gas Emissions are identified in Chapter 5 of 'Technical Paper 3 – Greenhouse Gas Emissions', however there is no basis provided for how these criteria were set. In addition, the criteria only quantifies how the emissions will impact on Australia's overall emissions profile, with no consideration of other impacts of climate change on the environment and communities in the Western Parkland City.

The criteria identifies 'Major' impacts as occurring if there is a significant increase in annual greenhouse gas emissions representing >1% of Australia's total annual greenhouse gas emissions (excluding emissions relating to land use). While it is noted that the Sydney Basin currently experiences a high level of existing aircraft movements, full operation of WSI to 2055 will result in a significant increase in the number of flights and associated emissions.

The conclusion that *"In the years to 2040, these emissions are unlikely to make material difference in the physical risk of future climate change projections, as historic CO₂e emissions have already been locked in global warming over this timeframe"* is not satisfactory. The Draft EIS states further: *"Beyond this date to 2055, WSI's CO₂e*



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emissions may marginally contribute to potential climate change but not at a level expected to inhibit Australia's commitment to emissions reduction targets made under the Paris Agreement or a transition to a net zero emissions economy by 2050.” (p.xiv: ‘Technical Paper 3 - Greenhouse Gas Emissions’).

Further to these statements in the Draft EIS, no real consideration of the impacts of emissions related to climate change on a local scale has been considered i.e. for the Camden LGA, with the focus almost exclusively on what this means for Australia's emissions targets. Impacts that require consideration include those on local biodiversity and threatened species, human health, infrastructure, etc. An outline of climate risks for the operation of WSI is noted in the Draft EIS, however greater consideration is required of how the ongoing operation of WSI will impact on the environment and communities of the Sydney Basin that are already experiencing the impacts of climate change.

For the Camden LGA community to have faith that operation of WSI will not actively contribute to a nett increase in greenhouse emissions in catalysing climate change, the Australian Government must include appropriate mitigation and monitoring measures as part of an approved EIS.

2. Operational Sustainability Strategy/Plan for WSI

Much of the narrative in the Draft EIS pertaining to greenhouse gas emissions, and particularly any mitigation and management thereof, relies on the action of others outside the operation of WSI i.e. the Draft EIS claims that minimising greenhouse gas emissions is “*outside of the control of this project*”.

However, reference is made in the Draft EIS to the preparation of an ‘Operational Sustainability Strategy’ and ‘Operational Sustainability Plan’ for WSI, described as a “roadmap” to progress WSI along a ‘Carbon Neutral Pathway’. These aspirational strategies and plans present as encouraging indicators of the Australian Government's intent that its infrastructure investment in WSI would ultimately not cause harm to the natural environment and community in the Camden LGA and broader Western Parkland City. Regrettably, the Draft EIS makes no reference as to ‘when’ these strategies or plans will be developed, nor does it require WSA Co's compliance to their implementation as a prerequisite to the ongoing operation of WSI. Consequently, the risk remains that operation of WSI will result in a significant increase in greenhouse gas emissions, to the considerable detriment of the natural and human environment in its surrounds.

For the Australian Government to meet its pledged commitments to mitigate climate change, it must direct WSA Co to urgently prepare the proposed WSI ‘Operational Sustainability Strategy’ and ‘Operational Sustainability Plan’, and in doing so, that WSA Co comprehensively engage with all stakeholders in their preparation. Further, these strategies and plans must include enforceable targets to reduce greenhouse gas emissions, and ensure that WSI's ongoing operation is contingent on meeting those reduced targets.

3. Greenhouse Gas Emissions – Medium and Long-Haul Destinations

The Draft EIS makes the following statement regarding the source of greatest impact from greenhouse gas emissions resulting from WSI;



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“With respect to potential greenhouse gas emissions, the most emissions-intensive flights are those operating regular passenger transport services to medium and long-haul destinations. In 2033 and 2055, these services accounted for only 27 and 23 per cent of projected total air traffic movements but were responsible for more than half of all full-flight emissions of CO₂e (carbon dioxide equivalent).” (page 41, Draft EIS – Draft Environmental Impact Statement: Summary).

The emissions calculations show that the flight emissions will be responsible for 1.75 MT of CO₂e in 2033 and 8.65 MT of CO₂e in 2055. When compared with the projected emissions for Australia at the same time these emissions are the equivalent of 0.51% in 2033 and 4.92% in 2055, significantly higher than the 1% threshold for ‘major’ impacts identified in the Draft EIS. However as per standards under the ‘United Nations Framework Convention on Climate Change’ (UNFCCC) domestic and international aviation emissions are treated separately, with only the domestic emissions included in Australia’s emissions inventory – international emissions are dealt with separately resulting in contributions of 0.13% in 2033 (0.45MT CO₂e) and 0.54% in 2055 (0.95MT CO₂e).

While the use of established greenhouse gas emissions standards is supported it does not seem appropriate to completely discount the emissions that will be generated by international travel both into and out of WSI, and in particular to discount the impact that these emissions will have on global climate change as well as local impacts on the Western Parkland City. When considering that this analysis focussed only on the current project which includes emissions associated with aircraft movements, and does not include emissions from the construction and operation of the airport, it is clear that as a whole WSI is likely to have a significant impact on greenhouse gas emissions in the long term and contribute to adverse climate change impacts.

As a consequence of the generation of greenhouse gas emissions catalysed by the operation of medium and long-haul aircraft at WSI, it is recommended the Australian Government make the necessary statutory arrangements to ensure that these services are predominantly operated to/from Sydney Kingsford-Smith Airport (KSA). Given the spatial proximity of its airspace to coastal waters there is likely less impact on the Harbour City population from medium and long-haul flights, in contrast to the WSI operation projected impacts at 2033 and 2055 on the Western Parkland City.

4. Greenhouse Gas Emissions – Cumulative Impacts

The Draft EIS has acknowledged that the WSI project will contribute toward cumulative adverse impacts of greenhouse gas emissions resulting from operation of WSI, and that these impacts will result in a larger overall effect on the environment and the greenhouse gas emissions budget in Australia and in NSW. The cumulative adverse impacts are described as follows in the Draft EIS;

- *Incremental increase in transportation activity on ground-based road and rail networks with the potential to impact travel times due to congestion, customer experience at the airport and operational efficiency i.e. the ability to transport freight and passengers on-time;*
- *Alterations to air quality in Western Sydney;*



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- *Increases in the projected greenhouse gas emissions budgets of Australia and NSW; and*
- *Changes to the climate of the Sydney Basin with the potential to impact biodiversity.*

(page 79, Draft EIS: Technical Paper 3 - Cumulative Impacts).

Notwithstanding this acknowledgement, the Draft EIS downplays the adverse impact of greenhouse gas emissions on the environment, stating that the impacts are minimal:

“On an economy wide basis, the greenhouse gas emissions from WSI are small. In the years to 2040, these greenhouse gas emissions are unlikely to make material difference in the physical risk of future climate change projects, as historic greenhouse gas emissions have already been locked in global warming (sic?) over this timeframe.”

(p. 80: ‘Technical Paper 3 - Greenhouse Gas Emissions’)

That the Australian Government would rely upon an assessment that greenhouse gas emissions from WSI are “unlikely” to make a material difference to the health and wellbeing of Camden LGA residents is of significant concern.

Despite detailed calculations of emissions associated with the WSI project, the Draft EIS concludes that as greenhouse gas emissions are out of the control of the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (DITRDCA) that no project specific emission mitigations, management measures or monitoring is proposed.

Action on nett zero for greenhouse gas emissions is supported by the NSW Government with emission reduction targets intended to achieve nett zero by 2050. In addition, Camden Council and many other local government organisations within the Sydney Basin have adopted their own nett zero targets and have committed to wide ranging actions to reduce and transparently report emissions.

The lack of measures around greenhouse gas emissions management appears incongruous, with information provided in section 4.5 of *‘Technical Paper 3 - Greenhouse Gas Emissions’* (page 41) noting that WSA Co has a *‘Design and Construction Sustainability Plan (2022)’* which includes requirements from the Airport Plan and 2016 EIS (accounting for emissions from ground activities). It notes that an Operational Sustainability Strategy and Operational Sustainability Plan are currently under development and will be available prior to commencement of WSI operations in late 2026 and that a core ‘building block’ will be a roadmap to progress WSI along a Carbon Neutral pathway. This will include a strategy to support aviation partners to reduce emissions including those produced by aircraft engine use for landing and take-off (<3,000 feet) with plans to enter the Airport Carbon Accreditation program.

It seems that there is recognition from the operator of the airport (WSA Co) that a significant focus on working collaboratively with industry partners to monitor and reduce emissions is needed, however no recognition from the development proponent (DITRDCA) that they have a role to play.

Draft EIS *Technical Paper 3 (p. 83)* states that emissions from the aviation industry are one of the hardest to abate due to the lack of immediately transferrable technology and



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fuels to reduce emissions. This should be an even greater driver for the need to develop targeted mitigation strategies, monitoring and reporting to ensure a transition pathway for this significant source of emissions.

The approach is at odds with current Government policy and legislation and community sentiment, which identifies the need for urgent and transformative action on climate change.

The Australian Government must consider the quantifiable impacts of greenhouse gas emissions resulting from operation of WSI, and implement a meaningful mitigation strategy to safeguard the health and wellbeing for the Camden LGA community.

Recommended that the Australian Government:

- Amend the Draft EIS to include the statutory requirement of the appropriate Australian Government agency and/or airport operator to manage greenhouse gas emissions mitigation and monitoring systems, for future operation of WSI;
- Direct WSA Co to prepare the proposed WSI 'Operational Sustainability Strategy' and 'Operational Sustainability Plan', and in doing so, that WSA Co engage with all stakeholders in their preparation. Further, these strategies and plans must include enforceable targets to reduce greenhouse gas emissions, and ensure that WSI's ongoing operation is contingent on meeting those reduced targets;
- Make the necessary statutory arrangements to ensure that medium and long-haul flight services are predominantly operated to/from Sydney Kingsford-Smith Airport (KSA), to actively mitigate the adverse impacts from greenhouse gas emissions to the Western Parkland City; and
- Conduct a thorough analysis of the quantifiable impacts of greenhouse gas emissions resulting from the operation of WSI, and implement a meaningful mitigation strategy to safeguard the health and wellbeing for the Camden LGA community.

Hazard and Risk

Key issues for the Camden LGA

1. Aircraft Crash Risks

The following statement is referenced from page 39 of the 'Draft EIS: Technical Paper 4 – Hazard and Risk', which addresses the issue of 'Societal Risk' resulting from the operation of WSI;

"The societal risk impacts have been determined by consideration of the full range of accident scenarios involving aircraft of different sizes from the fleet mix anticipated in 2033 and 2055 and impacts in different locations with different densities of occupation.



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This approach provides for the determination of the probability of accidents giving rise to a defined number of fatalities from one up to the maximum number estimated for a crash of the largest aircraft type into an area with the highest density of occupation”.

What is omitted from this section of the Draft EIS is that not one third-party fatality should be considered an acceptable risk i.e. any person located on the ground being fatality injured during an aircraft crash incident. In spite of this, the Draft EIS posits that an estimated number of ‘ten’ third-party fatalities resulting from an aircraft crash risk “does not represent a particularly high number that would merit the application of a significant high fatality risk aversion factor” (page 41, Draft EIS: Technical Paper 4 - Hazard and Risk). It is noted that neither ten, nor even one fatality is considered an acceptable risk to the Camden LGA community in the operation of WSI.

Regarding the issue of aircraft crash risk, as a major international aircraft manufacturer, the Boeing company have stated that while cruising at altitude makes up the majority of time in the air, this phase of flight accounts for just 9% of all fatal aircraft accidents. In fact, almost half of all fatal accidents occur during final approach and landing phase of aircraft flight.

Distribution of Fatal Accidents and Onboard Fatalities | 2013-2022

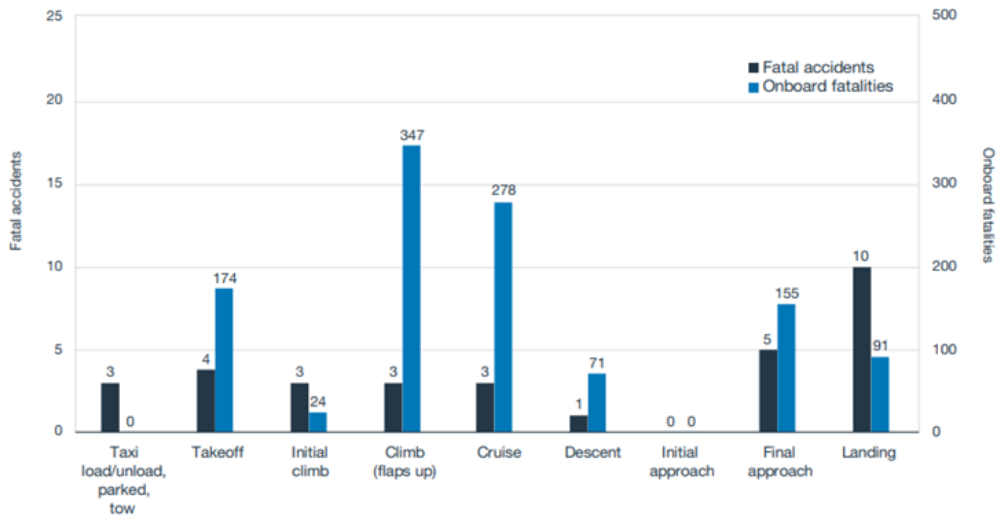


Figure 17: Boeing – Statistical Summary of Commercial Jet Airplane Accidents (page 13)

This evidence supports the present risk to the Camden LGA community resulting from operation of WSI – a risk that were it to result in a single fatality, should be deemed as unacceptable.

Of particular concern regarding Aircraft Crash Risk is the proposed RRO arrangements for WSI, and the potential for conflict in aircraft movements that it creates. For example, the fatal aviation incident at Tokyo’s ‘Haneda International Airport’ in January 2024 highlights the inherent risk of RRO arrangements. Haneda International Airport has a similar ‘mixed mode’ arrangement for its runway operation – the recent critical incident at



Haneda is cause for the Australian Government to 're-think' the RRO option for WSI in mitigating risk to the community.

Based on these key points, it is recommended that the Draft EIS is updated to include an accurate representation that appropriately quantifies and reflects the identified potential risk to human life resulting from the operation of WSI.

2. Fuel Dumping

Observations noted in the Draft EIS depict a low risk assessment associated with fuel dumping from aircraft, based on the rationale that they *"will have no significant adverse impact at ground level if carried out in accordance with appropriate procedures"* (page 49, *Draft EIS: Technical Paper 4 - Hazard and Risk*).

There is concern for the health and wellbeing of the Camden LGA community and environment, in the event of any fuel dumping resulting from the operation of WSI; whether that impact is significant or otherwise. Concern is noted on the potential for occurrence of the airborne emission of toxic chemicals in the form of aviation fuel as a significant environmental and community risk. For example, more than four million people in Sydney, the Illawarra and the Blue Mountains rely on water from the surrounding catchments; one of which is in immediate proximity to the proposed airport site. Water is collected from over 16,000 km² of land and stored in 21 storage dams (11 major dams) that hold a total of 2,500 billion litres of water. Exposure to this natural resource from airborne chemical spillage, even of a rare occurrence, is a significant issue that requires an appropriate mitigation strategy.

Notwithstanding the conclusion in the Draft EIS that fuel dumping in the operation of a major airport is uncommon and will not have impacts at ground level, the reality is that the Draft EIS does not provide any substantive evidence to support this claim. For example, on page 48 of the *Draft EIS: Technical Paper 4 - Hazard and Risk*, Table 8.1 depicts a series of selected fuel jettisoning incidents in Australia since 2009, numbering seven incidents in total. Of the seven incidents listed, the Paper reports that the Australian Transport Safety Bureau (ATSB) had no record of where the fuel dumps actually occurred, and/or of the impact at ground level. In fact, the ATSB noted that most of the fuel dumps occurred while the aircraft was over water e.g. Pacific Ocean, indicating that there are few, if any examples of recent fuel dumping events that occurred over land in Australia.

In light of the inadequate Hazard and Risk assessment for potential fuel dumping resulting from the operation of WSI, it is recommended that the Draft EIS is updated to include actual examples of where fuel dumping has occurred over land, supported by analysis of the associated resulting impacts on environmental issues such as air quality, water quality, biodiversity etc as well as on human health, and the mitigation measures used to manage this Hazard and Risk. Such examples may need to be sourced from comparable international airport operations if not available in Australia.

3. Meteorological Hazards

The Draft EIS refers to the Bureau of Meteorology's (BoM) *'Western Sydney Airport Usability Report'* (2015), in reflecting on how weather phenomena may adversely affect



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operations at WSI. As an agency of the Australian Government, while not an independent assessment, the BoM's report indicates the most significant weather aspect of the airport site is likely to be the occurrence of fog.

This is a key point of concern, as the Draft EIS states the development of fog overnight in the Western Sydney Basin is possible during all months of the year (and for extended periods of time during winter). Further, the BoM's 2015 report states that "*Badgerys Creek currently does not have the capability to determine visibility and cloud, and that Camden Airport has been identified by meteorological forecasters as the most representative site available for fog statistics*". An extract from the BoM's 2015 report also states the following:

Senior meteorologists experienced in forecasting for the Sydney Basin suggest that fog at Badgerys Creek is likely to occur more often than fog at Camden Airport. However without adequate instrumentation it is impossible to confirm the frequency of fog at Badgerys Creek.

Camden Tower operated by Airservices personnel is active between 2200 – 0800UTC and does not regularly report weather phenomena. It is impossible to verify the occurrence of all operationally significant fog events at Camden Airport without 24hr manual input because the instrument observing visibility reports shallow fog identically to deeper fog events. For the purposes of this section, fog will be said to have occurred when the visibility meter records a horizontal visibility below 1000m as a 10 minute average.

Source: 2015 WSI EIS Appendix D – Western Sydney Airport Usability Report (page 36)

With the current Draft EIS reliant on the BoM's 2015, it is evident that up-to-date data is required to ascertain the impacts of fog and the associated risk to flight paths over the Camden LGA. This is reinforced by the following recommendations noted in BoM's 2015 report;



5.4 Discussion

The data from Camden Airport suggests that both fog and low cloud could potentially produce low visibility conditions at WSA. More definitive fog and low cloud information would be possible with the implementation of further automatic meteorological equipment at Badgerys Creek.

Recommendation 6: Automatic instrumentation for cloud and visibility should be installed for the collection of climatological information and for the production of forecast products in future

Navigational instrumentation can be installed to mitigate against low visibility phenomena reducing the impact to 24/7 airport operations at WSA.

Recommendation 7: Appropriate low visibility landing equipment, such as runway visual range (RVR) needs to be considered in order to optimise operations at WSA.

The future development of the site into an airport is unlikely to affect low cloud frequency; however an increase in pollutants could potentially affect fog frequency, longevity and severity. The condensation of cloud, including fog, is partially dependent on the availability of Cloud Condensation Nuclei (CCN). CCN are aerosols within the atmosphere with hygroscopic properties which aid in the nucleation of water. Typically a CCN particle will be of the order of 0.1µm. The combustion of jet fuel releases additional CCN into the atmosphere. The development of a major airport at Badgerys Creek could impact on the fog climatology at the AWS site.

Source: 2015 WSI EIS Appendix D – Western Sydney Airport Usability Report (page 50)

There is no evidence that the current Draft EIS has responded to these recommendations from the BoM's 2015 report. In this regard, an update to the current Draft EIS is recommended, as it is possible that without this analysis the Australian Government are not aware as to what impact combustion of jet fuel releases will actually have on fog climatology over the Camden LGA or at the WSI site.

4. Objects Falling From Aircraft

The Draft EIS notes that between the years of 2003 and 2022 the Australian Transport Safety Bureau (ATSB) recorded 189 occurrences of objects falling from aircraft involving commercial air transport movement, within Australian airspace. At an average of ten events per annum, and excluding similar occurrences from non-commercial aircraft (meaning the average could be much higher), the risk resulting from objects falling from aircraft operating out of WSI is especially real for people and property in the Camden LGA.

The types of risks identified in the Draft EIS from objects falling from aircraft include:

- Aircraft maintenance inspection panels;
- Baggage from aircraft holds following cargo door failure;
- Windscreen wipers;
- VHF antennas.

In responding to the observation of identifiable risks in the form of objects falling from aircraft, the Draft EIS states the following: *“The overall conclusion to be drawn from these*



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observations is that the risks associated with objects falling from aircraft is negligible and can therefore be considered to be acceptable". This statement is contested as it provides no rationale nor evidence to substantiate such a claim.

One of the identified risks more likely to occur as a result of aircraft operating at WSI is the occurrence of ice derived from aircraft falling to ground. The primary cause of this occurrence is the result of frozen condensation detaching from aircraft as they reach warmer air on their approach to land. This is most likely to be a factor at WSI, as the Australian climatic environment is renowned for its extremity in weather conditions, and combined with diverse flight paths varying from warmer climates in the north, as well as flight paths with proximity to Antarctica, the risk of ice falling from aircraft over the Camden LGA is possible.

As the Australian Government already have a clear indication of the flight paths to/from WSI, analysis of risk as to the number of occurrences from ice falling to ground from aircraft is possible, particularly from those operating in airspace that may catalyse such events. In this regard, it is recommended that the Australian Government conduct such analysis, and update the Draft EIS to quantify the likely number of events where ice could fall from aircraft over areas of the Western Parkland City.

Recommended that the Australian Government:

- Update the Draft EIS to include an accurate representation that appropriately quantifies and reflects the identified potential risk to human life resulting from the operation of WSI;
- Update the Draft EIS to include actual examples (either domestic or international) where fuel dumping has occurred over land, supported by analysis of the associated resulting impacts on environmental issues such as air quality, water quality, biodiversity etc as well as on human health, and the mitigation measures utilised to manage this hazard and risk;
- Review and update the BoM's 2015 'Western Sydney Airport Usability Report', and in turn update the Draft EIS, to ascertain what impact combustion of jet fuel releases will have on fog climatology over the Camden LGA or at the WSI site, for the safe management and operation of WSI; and
- Analyse the risk as to the number of occurrences from ice falling to ground from aircraft, particularly from those operating in airspace that may catalyse such events, and update the Draft EIS to quantify the likely number of events where ice could fall from aircraft over areas of the Western Parkland City.

Wildlife Strike Risk

Key issues for the Camden LGA

1. Limitations and Assumptions



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Based on the narrative depicted in the *Draft EIS: Technical Paper 5 - Wildlife Strike Risk* it is evident that the Australian Government have limited certainty as to the risk posed to the community from an aircraft crash caused by wildlife strike risk. As stated in the Draft EIS, “the risks identified are dynamic and are not necessarily accurate predictors of future risks” (p19: *Draft EIS: Technical Paper 5 - Wildlife Strike Risk*).

While it is acknowledged the movement of wildlife is indeed dynamic, an assessment of risk is nonetheless critical to the safe operation of WSI – as an issue of the highest priority, safety of the Camden LGA community is paramount and should not be negotiable. To this end, it is possible to evaluate an assessment of risk from wildlife strike based on the study of wildlife movement patterns in proximity to the WSI flight paths. However, in this regard the Draft EIS states that “A high-level wildlife movement study has not been completed.” (p19: *Draft EIS: Technical Paper 5 - Wildlife Strike Risk*).

The Draft EIS claims compliance with risk assessment for wildlife strike, without having conducted a wildlife movement study for WSI. The Draft EIS claims preparation of a wildlife movement study was not possible due to “Delays in overall project approval” and “Delays in approval to access private land” (p19: *Draft EIS: Technical Paper 5 - Wildlife Strike Risk*) – given the WSI project was announced in 2014, and the Stage 1 Draft EIS prepared in 2015, it is difficult to accept that an almost ten year time period was not adequate to conduct a thorough risk assessment of wildlife strike.

To mitigate wildlife strike risk to future aircraft operating out of WSI, with a view to mitigating risk to the Camden LGA community resulting from aircraft crash catalysed by wildlife strike, the Australian Government must conduct a comprehensive high-level wildlife movement study and wildlife strike risk mitigation strategy for inclusion in the Draft EIS.

2. WSI Wildlife Hazard Management Committee (WHMC)

As part of the proposed mitigation measures in managing aircraft hazard and risk, one of the action items in the Draft EIS (HR7 Wildlife strike p. 13-28) states that WSA Co will establish a WSI Wildlife Hazard Management Committee (WHMC), comprised of Western Sydney local government representatives, NSW Department of Planning and Environment and other relevant aviation stakeholders. The Draft EIS states that this committee would not convene until 2026 i.e. once WSI becomes operational.

For an informed response to the management of aircraft risk resulting from wildlife strike at WSI, it is crucial that any such committee is convened as a matter of urgency i.e. in 2024, not in 2026. The next three years will be critical in the study, analysis, planning and implementation of actions required to mitigate risk via wildlife strike. It is therefore recommended that the WHMC is convened urgently, and that its membership includes a representative from Camden Council, and also from the National Parks and Wildlife Service (NPWS).

3. Greening of the Western Parkland City

As acknowledged in the Draft EIS, the vision of the Western Parkland City would see an increased tree canopy cover throughout its entirety, including enhanced riparian zones/wetlands, and maximized biodiversity areas – all of which would facilitate a



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correlation of increased birdlife activity in proximity to WSI. By way of response, the Draft EIS states that this is likely to attract wildlife, and “*will require a balanced approach to deliver this vision while at the same time safeguarding airport operation to minimise the numbers, flock size and diversity of wildlife operating in and around the WSI airspace. The wildlife attraction is yet to be fully understood.*” (P41: Draft EIS: Technical Paper 5 - Wildlife Strike Risk).

While the Draft EIS acknowledges an increase of wildlife presence in and around the WSI airspace, and the inherent risks associated with such an incompatibility, it does not quantify what constitutes a “*balanced approach*” to addressing this issue. This is despite the fact that the vision of the Western Parkland City has been established for several years, providing ample opportunity for the Australian Government to liaise with the NSW Government (and with Council) in investigating this issue further.

It is imperative that the Australian Government updates the Draft EIS to comprehensively address the inherent risks associated with increased wildlife activity in the Western Parkland City, and that this is managed relative to the safe operation of WSI airspace over the Camden LGA.

4. Cumulative Impacts of Wildlife Strike Risk

The Draft EIS notes as a result of the operation of WSI the cumulative impacts from Wildlife Strike Risk are the result of incremental, sustained and combined effects of human action and natural variation over time. With this point in mind, it is evident that the Australian Government must further quantify the analysis of potential for Wildlife Strike Risk, through incremental, sustained and combined analysis of the projected risks. The Draft EIS, while primarily focused on the risk of wildlife strike, provides minimal assessment of the impact of strike on fauna.

The Draft EIS states that the conservation and animal welfare costs of wildlife strikes are hard to quantify (*Technical Paper 5 - Wildlife Strike Risk, section 6.4*) and recognises that aviation safety takes precedence with little assessment or understanding of the impact of strikes on endangered species and biodiversity more broadly. The impacts of the flight paths in terms of fragmenting and disturbing habitat for fauna is also unknown, including impacts on threatened species identified within the area.

The Draft EIS also notes that it cannot assess the impacts of the project on flying foxes without long term baseline studies of movement and foraging ecology (*section 6.3.2*), and notes that there is no evidence to support whether or not wildlife strike is likely to be a key threatening process affecting the threatened species. In this regard the Precautionary Principle suggests that mortality as a result of wildlife strikes should be avoided.

Some discussion of the impact of noise on wildlife was included in the technical paper, however it notes that research in this space is limited, and it is not possible to generalise the response of wildlife to noise.

As previously noted, the Draft EIS also recognises targets within the Western Parkland City, and the Western Sydney Aerotropolis that are seeking to increase tree canopy cover to 40% and enhance riparian and bushland throughout the area. There is the potential that



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these targets will lead to changes in the species located in proximity to the project area, as well as their numbers, distribution and behaviours. Enhanced monitoring prior to operations commencing will assist with building a baseline inventory and allow changes, both positive and negative, to be tracked and monitored over time, and any required measures to protect safety and biodiversity to be implemented as early as possible.

Similarly, the cumulative impact of the project on wildlife within the project area is unable to be determined due to the lack of understanding of the movement of birds and flying foxes in the area and how the future operations and development within the Western Sydney Aerotropolis might impact wildlife.

The amalgam of analysis of Wildlife movement/behaviour in proximity of all the projected WSI operational areas, combined with benchmarking of other airports operating in the Sydney Basin, should provide usable data over the remaining years prior to WSI opening. This information should better inform the Australian Government to adequately respond to managing the mitigation of Wildlife Strike Risk resulting from the operation of WSI, in ensuring the safety of its users and the broader Western Parkland City community.

Recommended that the Australian Government:

- Conduct a comprehensive high-level wildlife movement study and wildlife strike risk mitigation strategy for inclusion in the Draft EIS;
- Convene the WSI Wildlife Hazard Management Committee (WHMC) as a matter of urgency, and that its membership includes a representative from Camden Council, as well as the National Parks and Wildlife Service (NPWS);
- Updates the Draft EIS to comprehensively address the inherent risks associated with increased wildlife activity in the Western Parkland City, and that this is managed relative to the safe operation of WSI airspace over the Camden LGA; and
- Further quantify the analysis of potential for Wildlife Strike Risk, through incremental, sustained and combined analysis of the projected risks.

Land Use and Planning

Key issues for the Camden LGA

1. Land Use Planning Impacts on the Camden LGA

The Draft EIS notes that the NSW planning framework has taken a precautionary approach to residential land use development regarding WSI operations, adopting an approach which relies on ANEF contours to inform planning decisions for residential land uses in areas affected by aircraft noise. However, the ANEF contours are still subject to approval, and based on information made available in the Draft EIS, there are evident aircraft noise impacts that occur outside of these contours i.e. inside the boundary of the Camden LGA.



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Notwithstanding the precautionary approach taken with regard to future residential development areas administered by the 'Western Parkland City SEPP', it remains the case that land areas in the Camden LGA will be significantly impacted by aircraft noise, and that the use of average measurements via the ANEF and ANEC contours do not necessarily depict the 'real world experience' of residents on the ground.

As noted previously in this submission, the N70 contour measurement is based on the intensity and number of individual aircraft noise events experienced over an 'average' 24-hour period. The Camden LGA areas that are directly impacted by the N70 contours could be affected by aircraft overflights in excess of 70dB. This highlights the potential adverse noise impacts that certain parts of the Camden LGA will experience as a direct result of the preliminary flight paths for WSI, depicted as follows;

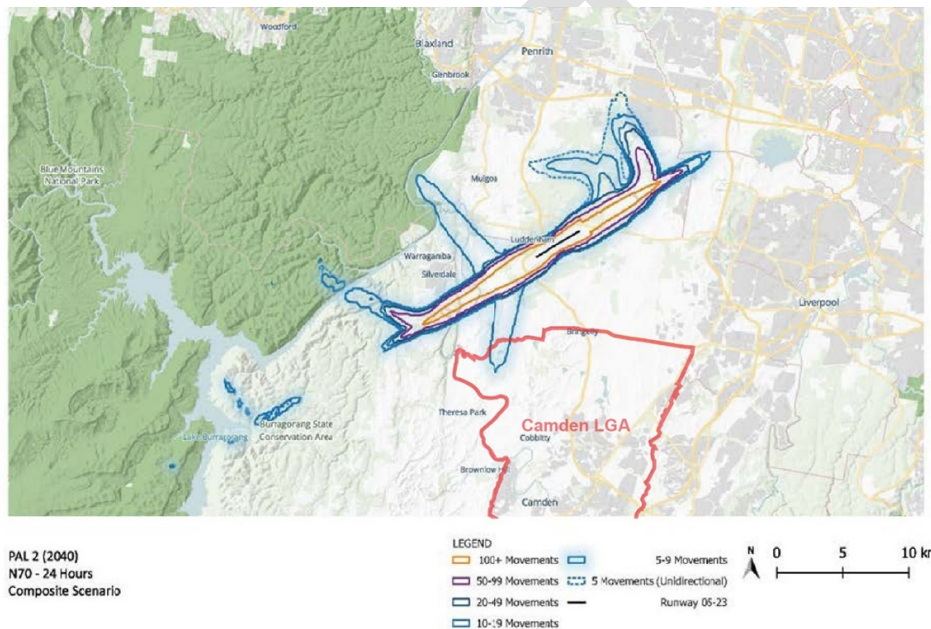


Figure 9: N70 Contours (2040) (Source: Draft EIS: Part C – Env Impact Assessment (Sept 2023) p11-39)

Given the proximity of the N70 Contours to future residential development in the Camden LGA, it is recommended that the Draft EIS is reviewed and updated to transparently reflect the extent of adverse noise impacts beyond the average of ANEF/ANEC contours.

2. Land Use Planning for WSI Dual Runway

One of the key shortcomings in the Draft EIS is its limitations for assessment of future environmental impacts based on the operation of only a single runway for WSI. This is despite the Australian Government's entire planning vision and framework for its second major airport in the Sydney Basin to comprise of a dual runway airport, operating 24-hours.

The limited scope of the Draft EIS (based on a single runway) has implications for future land use planning in the broader Western Parkland City, including the Camden LGA. While



there are longstanding planning controls in the form of the 'ANEC Contours' and the 'Obstacle Limitation Surface' in managing land use incompatible with future WSI operation, the Draft EIS assessment only identifies land use impacts associated with a single runway. It is likely that future WSI aircraft movements under a dual runway option will be significantly higher, impacting land areas in the Western Parkland City that could be subject to future rezoning.

It is crucial that the Australian Government promotes a transparent planning process via the Draft EIS, in fully quantifying the anticipated impacts associated with the future dual runway operation of WSI. In this regard, it is recommended that the Australian Government review and update the Draft EIS to ensure that its assessment of impacts for land use planning reflect the WSI dual runway option.

Recommended that the Australian Government:

- Review and update the Draft EIS to reflect the extent of adverse noise impacts in existing and future residential areas in the Camden LGA beyond the average of ANEF/ANEC contours; and
- Review and update the Draft EIS to ensure that its assessment of impacts for land use planning reflect the future WSI dual runway option.

Landscape and Visual Amenity

Key issues for the Camden LGA

1. Landscape Character and Visual Impacts on the Camden LGA

The Draft EIS claims to consider the landscape character and visual impacts of WSI operating in 2033 and 2055 using a representative viewpoint approach for airspace activity during day and nighttime hours. While the Draft EIS rates the landscape character and visual impact assessment in categories of high, moderate, low and negligible, it does not discernibly describe what these ratings represent in evaluating those impacts.

In conducting an assessment on landscape character and visual impact assessment, the Draft EIS delineates affected areas into 'landscape character zones (LCZ).' Accordingly, the LCZ identified to impact the Camden LGA is depicted as follows;



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7.1.10 LCZ10 – Leppington rural residential landscape character zone

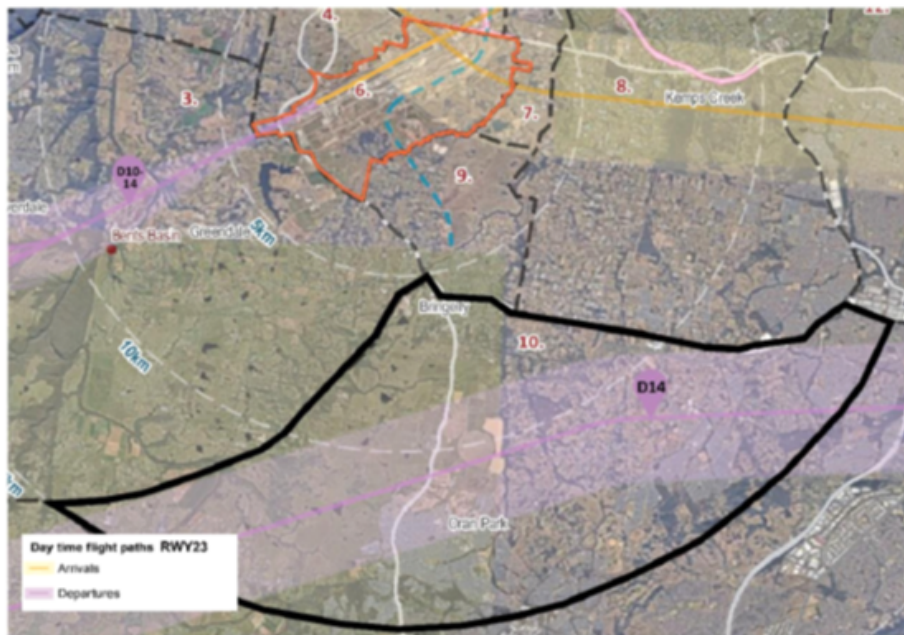
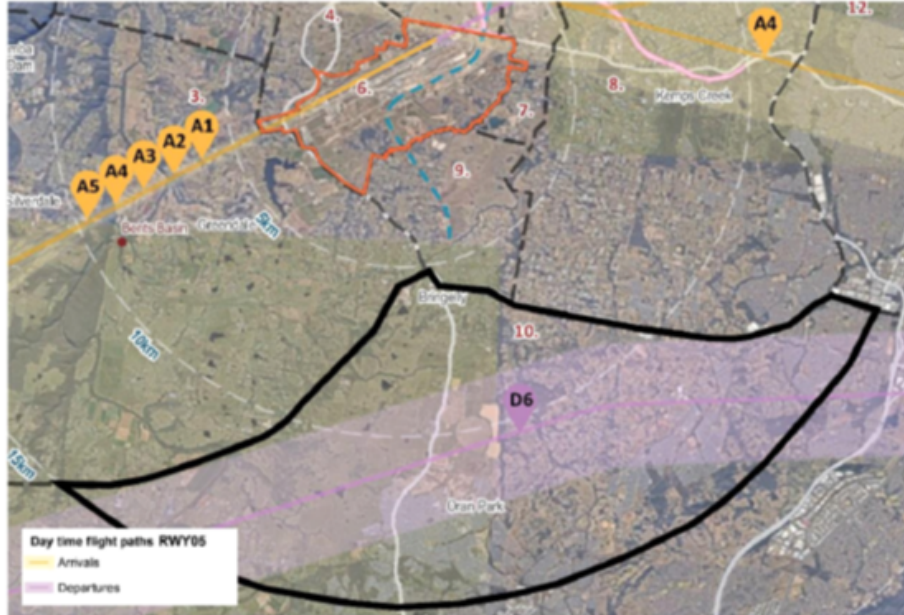


Figure 18: (Source: Draft EIS: Technical Paper 7 - Landscape and Visual Amenity p.74 (Sept 2023))

While LCZ10 depicted in the Draft EIS is described incorrectly as ‘Leppington Rural Residential Landscape’, as it in fact covers a greater geographical footprint than just Leppington, the Draft EIS otherwise does acknowledge that this area is subject to major



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urban development in the future. However, in 2033 it rates WSI's impact to landscape character and visual amenity as 'moderate' and the magnitude of change as 'negligible'; and while aircraft movements would more than double in the ensuing period to 2055, it retains the same assessment rating i.e. moderate/negligible.

As previously noted, there are no definitions in the Draft EIS that describe the relative meaning of 'moderate' or 'negligible' ratings. What is of particular concern, however, is the basis on which these assessments are determined. For example, the following extract from the Draft EIS represents the landscape character and visual amenity impact for LCZ10 at 2055;

2055 scenario		
Sensitivity	Moderate	This zone would continue to be predominantly urban with a new Town Centre and continue to be heavily used and valued by a dense concentration of residents and recreational users.
Magnitude of change	Negligible	<p>This zone would be overflowed by the same flight paths at the same altitudes, with flights increasing in frequency, including:</p> <ul style="list-style-type: none"> • RWY05 departures (D6), to about 25 flights on average, up to a maximum of about 57 flights, per day • RWY23 departures (D14) to about 30 flights on average, up to a maximum of about 57 flights, per day. No arrival flights would pass over this zone. <p>Overall, the project would not appreciably change the character of this zone.</p>

As this extract states, any impact to LCZ10 (i.e. the Camden LGA) for landscape character and visual amenity is rated as negligible in 2055. However, this assessment is only based on RWY05 and RWY23 departures; it is not based on Reciprocal Runway Operation (RRO) i.e. a 'no preference option', which is used to evaluate other environmental impacts throughout the Draft EIS.

For a genuine assessment of landscape character and visual amenity on the Camden LGA, the Australian Government must review the Draft EIS to articulate/define the meaning of impact assessment ratings e.g. high, moderate, low, negligible, and for LCZ10, evaluate the sensitivity and magnitude of change for landscape character and visual amenity for the RRO of WSI.

2. Night-time Visual Impacts

As noted previously, the Draft EIS claims to consider the landscape character and visual impacts of WSI operating in 2033 and 2055 using a representative viewpoint approach for airspace activity during nighttime hours. However, while in the Draft EIS *'Part C: Environmental Impact Assessment'* there are pictorial representations of the 'day-time visual impacts' resulting from operation of WSI, there are no similar images provided for night-time visual impacts. Clearly it is not practicable to provide 'actual' night-time images of the visual impacts of aircraft, however equivalent silhouette depictions of aircraft in airspace proximity to certain areas would be of benefit, similar to images present in the Draft EIS;



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Figure 15.17 View south from St James Anglican Church, Luddenham Village, Runway 05 photomontage (top) flight paths shown (bottom)

Figure 19: (Source: Draft EIS – Part C: Environmental Impact Assessment p.15-46 (Sept 2023))

This is particularly crucial for the RRO of WSI, as these flight paths operating during the night-time will have significant and direct visual impacts on the Camden LGA.

Further to this point, the Draft EIS states that night time flight paths account for flights between 11:00pm and 5:30am, while certain day time flight paths would operate during periods of darkness, between sunset and 11:00pm. Consequently, while an assessment of the night-time visual impacts was conducted in the Draft EIS, it did not include the RRO option – operation of WSI during 11:00pm and 5:30am will have a direct impact on the Camden LGA.



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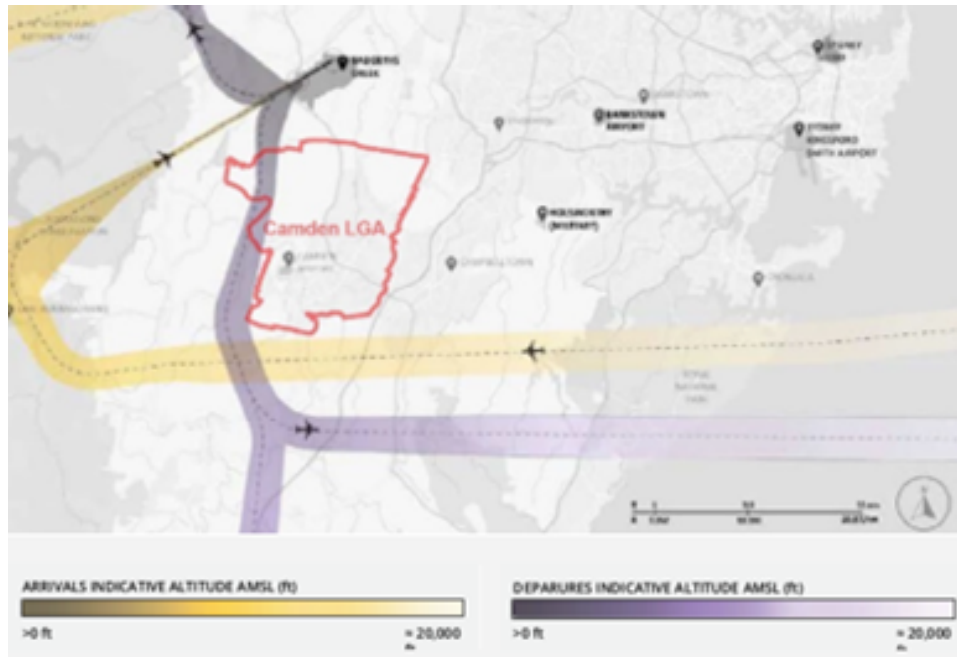


Figure 20: Night RRO Arrivals and Departures (Source: Draft EIS: Part B – The Project (Sept 2023) p7-34)

The Draft EIS must include an assessment of the night-time visual impacts resulting from the RRO option, to quantify the direct implications for the Camden LGA community.

It is recommended that the Australian Government update the Draft EIS to include pictorial (silhouette) representations of the night-time visual impacts on the Camden LGA, and the inclusion of a proper assessment of the night-time visual impacts, resulting from the RRO of WSI.

3. Cumulative Impacts – Landscape & Visual Amenity

Further to the issues noted earlier in this submission regarding the area referred to as LCZ10, reference is made to the cumulative impacts encountered for landscape and visual amenity. On this issue, the Draft EIS had stated that only projects or developments that were considered of a sufficient scale to contribute materially to cumulative impacts at a regional level were assessed. The Draft EIS referenced a range of different projects by way of example, including those that would in future directly impact the Camden LGA e.g. Sydney Metro – Aerotropolis to Narellan, Outer Sydney Orbital etc. However, a significant project impacting on the future of area LCZ10 was omitted from the assessment i.e. the future South Western Rail Link (SWRL) Extension (New Cumberland Rail Line), between Leppington and the Aerotropolis. As in the case with the Sydney Metro – Aerotropolis to Narellan, the SWRL Extension will have a considerable cumulative impact on LCZ10.

Given the oversight in the Draft EIS of a significant item of infrastructure contributing toward the cumulative impacts on landscape and visual amenity, it is crucial that the Draft EIS is updated to include the SWRL Extension, to quantify how in conjunction with WSI it will adversely impact the landscape and visual amenity of the Camden LGA community.



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4. Landscape Impact During WSI Operation

As previously noted in this submission, area LCZ10 identified in the Draft EIS represents parts of the Camden LGA adversely impacted by WSI operations for landscape and visual amenity. Notwithstanding, without any supporting evidence, the Draft EIS states that “Overall, the project would not appreciably change the character of this zone.” (Draft EIS: Technical Paper 7 – Landscape and Visual Amenity (p. 76)). This subjective statement is made in reference to both WSI operating timeframes of 2033 and 2055.

However, in evaluating the ‘magnitude of change’ for the landscape and visual amenity for LCZ10, it is not clear if the Australian Government have only considered operation of RWY23 for departures under normal WSI operating conditions, or if this also includes the RRO option. Consequently, the Draft EIS requires further review to ensure the assessment of LCZ10 zone includes an ‘objective’ assessment of the visual impacts resulting from RRO of WSI, with a quantifiable measurement of any change to the character of this zone.

Recommended that the Australian Government:

- Review the Draft EIS to articulate/define the meaning of landscape character and visual amenity impact assessment ratings e.g. high, moderate, low, negligible, and for LCZ10 area, evaluate the sensitivity and magnitude of change for landscape character and visual amenity for the Reciprocal Runway Operations of WSI;
- Update the Draft EIS to include pictorial (silhouette) representations of the night-time visual impacts on the Camden LGA of aircraft movements, and the inclusion of a proper assessment of the night-time visual impacts, resulting from the RRO of WSI;
- Review the Draft EIS to include the SWRL Extension in the list of projects contributing toward cumulative impacts and quantify how in conjunction with WSI it will impact the landscape and visual amenity in part of the Camden LGA community i.e. LCZ10; and.
- Review the Draft EIS to ensure the assessment of LCZ10 zone includes an ‘objective’ assessment of the visual impacts resulting from RRO of WSI, with a quantifiable measurement of any change to the character of this zone.

Biodiversity

Key issues for the Camden LGA

1. Protection of the Environment

It is the role of the Australian Government, under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), to protect Australia’s unique animals, plants, habitats and place. The Australian Government is not fulfilling this role in its planning for WSI via the Draft EIS.



Reference is made to the following statement in the *'Draft EIS: Technical Paper 8 – Biodiversity (p. 103)'*:

“As the WSI Airspace and Flight Path Design is unlikely to have a significant impact on biodiversity values protected under the EPBC Act, including biodiversity attributes associated with the GBMA. As such, in accordance with the EPBC Act Environmental Offset Policy the project is not obligated to provide offsets for impacts on biodiversity”.

That the Australian Government would determine it *“is not obligated to provide offsets for impacts on biodiversity”* on the basis that it is *“unlikely to have a significant impact on biodiversity values”* is not acceptable.

This is further compounded by the shortcomings identified in the Australian Government's 2015 Draft EIS. Data gaps were identified for the proposed airport site development in 2015 with respect to land access restrictions, threatened species locations, the assessment of threatened species, and a large deficit in the proposed offsets. The Biodiversity Assessment (Appendix K1 in the 2015 Draft EIS) did not clearly define the extent of land access restrictions. A key risk associated with insufficient land access is that biodiversity values and offsetting requirements may have been underestimated – this in turn highlights the shortcomings of the latest Draft EIS statement that it *“is not obligated to provide offsets for impacts on biodiversity.”*

Further assessments of significance in the 2015 Draft EIS were not completed for the Green and Golden Bell Frog, Australasian Bittern, Australian Painted Snipe and a number of migratory species listed under the EPBC Act. Key risks associated with the omission of these assessments are that the level of impact and the offsets required may have again been underestimated. The large credit deficit, particularly for Cumberland Plain Woodland in the Sydney Basin Bioregion, listed as a critically endangered ecological community under the *Threatened Species Conservation Act 1995* (TSC Act) and EPBC, is a key risk to the integrity to the environment and the merit of the WSI project.

While the Biodiversity Assessment (2015 Draft EIS - Appendix K1) provided a general assessment of the adverse long-term development impacts of the project, it did not consider the potential impact of successful implementation of biodiversity management measures from the Stage 1 development, which may result in increased biodiversity values and therefore underestimate the longer-term development impacts. In addition, the Offsets Strategy (2015 Draft EIS Appendix K2) did not state how offsets will be identified and secured for the long-term development.

Based on this analysis it is evident the Draft EIS should be reviewed to protect Australia's unique animals, plants, habitats and place, in quantifying and implementing offsets to the adverse impacts on biodiversity resulting from the WSI project.

2. EPBC Act (Vulnerable Species): Flying-Foxes

As a classified vulnerable species under the EPBC Act, the Draft EIS acknowledges that Flying-Foxes are particularly susceptible to wildlife strike due to their large body mass and their tendency to fly in large groups, which increases the risk of multi-strike events. This



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identified issue is two-fold, in that it places a vulnerable species at further risk while also endangering human life in the event of an aircraft vs. wildlife strike.

Dating back to the 2015 Draft EIS, the Australian Government identified the Grey-Headed Flying-Fox (*Pteropus poliocephalus*) at risk from the WSI project. This provided an ensuing period of 8+ years since 2015 in which to monitor and respond to identified risks to a vulnerable species. However, based on the current Draft EIS it is evident that minimal input was provided, with only four field surveys completed between July and October 2022, using human observation from static locations. The 2015 Draft EIS also outlined an offset package proposed to compensate for the removal of approximately 90.8 hectares of Cumberland Plain Woodland, 120.6 hectares of foraging habitat for the Grey-headed Flying Fox, and other features in regarding threatened flora and fauna species. However, there is no mention of any of these initiatives actioned by the Australian Government, in the current Draft EIS.

The current Draft EIS claims that *“The impacts of the project on the flying-fox behaviour, reproduction and nutritional status of the overall population is difficult to predict without long term baseline studies of movement and foraging ecology”*. This statement is disappointing, as there has been ample time (8+ years) to establish a baseline study of movement and foraging of a vulnerable species. The Draft EIS claims to rely on past strike data from Sydney (Kingsford-Smith) Airport and Bankstown Airport – two facilities located in highly urbanised areas, with minimal ecological similarities to the location of WSI.

Based on the environmental assessment of the impact from WSI operations on a vulnerable specie (Flying-Foxes), the Australian Government have not upheld their responsibilities under the EPBC Act. It is recommended that the commitments to protect vulnerable species identified in the 2015 Draft EIS be re-visited to ensure their implementation, and commit to conducting a thorough long-term baseline study of movement and foraging ecology of Flying-Foxes in proximity to WSI.

3. Draft EIS (Biodiversity): Limited Monitoring and Incomplete Data

The biodiversity assessment in the Draft EIS is based on limited monitoring and incomplete data. Targeted monitoring is needed to understand biodiversity values and impacts prior to WSI commencing operation in 2026.

Biodiversity impacts in the Draft EIS are assessed as minor, negligible and all ‘Matters of National Environmental Significance’ (MNES) and ‘Species Impact Assessment’ (SIA) are stated as not significant. However, a static assessment based on incomplete information should not inform an approval for a project with long term implications, such as in the case with WSI.

The Western Parkland City includes significant biodiversity values with many threatened plant and animal species, threatened ecological communities and areas of outstanding biodiversity value, including the Greater Blue Mountains Area. Many areas have already been identified by the NSW Government for biodiversity protection and conservation through their Biodiversity Values Map, and the Cumberland Plain Conservation Plan, with many landholders, including Camden Council, also recognising the high biodiversity value



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of their own land through ‘Biodiversity Stewardship Agreements’ and ‘Biobanking Agreements’.

Without comprehensive information presented in the Draft EIS, the precautionary principle and risk management principles should be applied to ensure these biodiversity values are protected. If these issues cannot be resolved prior to approval of the flight path design then a curfew for WSI that is consistent with operation of KSA is appropriate until the monitoring and evaluation program is completed.

4. Cumulative Impacts: Biodiversity

There is cause for considerable concern as to the cumulative impacts on biodiversity from the operation of WSI within the wildlife buffer and the Western Parkland City more broadly. This includes the direct and indirect impacts of the operation of WSI, as well as those adverse impacts associated with increased airport related infrastructure, land use changes and development within the Aerotropolis, population growth and increased traffic flow/hazards.

It is also noted that WSI’s operation has the potential to contribute to long term climate change impacts via the production of greenhouse gas emissions. Technical Paper 3 in the Draft EIS identifies that emissions from aircraft engines during all phases of flight will alter the atmospheric concentration of greenhouse gases and that climate change is an existential risk. The risk to biodiversity values has not been adequately assessed.

There are also significant potential impacts on the Greater Blue Mountains Area (GBMA) which is identified as an ‘Area of Outstanding Biodiversity Value’. With unknown interdependencies across the broader landscape, impacts on the GBMA are a key issue for everyone in the broader Western Parkland City.

The Draft EIS posits that it is not possible to forecast the cumulative or cascading impacts on native flora and fauna, as well as plant communities, particularly in relation to WSI’s contribution to climate change. In the absence of necessary evidence, the precautionary principle should dictate that at a minimum the WSI Draft EIS should identify a suite of mitigation measures to appropriately respond to this risk.

Recommended that the Australian Government:

- Re-visit the Draft EIS for WSI, and uphold its responsibility to protect Australia’s unique animals, plants, habitats and place, in quantifying and implementing offsets to the adverse impacts on biodiversity resulting from the WSI project;
- Re-visit the commitments to protect vulnerable species identified in the 2015 Draft EIS to ensure their implementation, and commit to conducting a thorough long-term baseline study of movement and foraging ecology of Flying-Foxes in proximity to WSI;
- Update the Draft EIS to include a report detailing a robust and rigorous monitoring program for all relevant issues including but not limited to candidate species, ‘Matters of National Environmental Significance’ (MNES) and ‘Species Impact



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Assessment' (SIA) against agreed thresholds (with a safety buffer), evaluation, reporting and the full scope of adaptive management strategies; and

- Review the Draft EIS and identify mitigation measures that respond to the potential for cumulative impacts on Biodiversity resulting from the operation of WSI.

Heritage

Key issues for the Camden LGA

1. Impact on Aboriginal Cultural Places and Values

It is noted in the Draft EIS that the Australian Government's consultation with First Nations knowledge holders regarding the WSI project, resulted in identifying a list of places that hold particular cultural value, and that these places were considered in the design of WSI's flight paths where possible. However, how this impact was managed through flight path design is not clearly quantified in the Draft EIS.

Notwithstanding, during the consultation process First Nations knowledge holders identified the area referred to as Belgenny Farm (also known as 'Koobawilla – place where stars are reflected in the water') at South Camden as being of cultural significance; this location has some proximity to WSI's RRO flight path option.

While there is some acknowledgement in the Draft EIS of the existence of Aboriginal heritage site impacts resulting from the operation of WSI, there are no specific impact mitigation recommendations suggested for these places, including 'Koobawilla'. In contrast, there is an entire report in the Draft EIS (Technical Paper 14) dedicated to impact mitigation for the Greater Blue Mountains Area, and while justifiably so, it should not be to the minimisation of impact mitigation of Aboriginal heritage sites of significance in the Camden LGA.

Of the recommended mitigation measures identified in the Draft EIS, most are general in nature, as it is unclear how Aboriginal sites of spiritual and high cultural significance will actually be monitored/preserved. Furthermore, there are no specific details provided in the Draft EIS regarding the required research program and what it will entail. It is therefore recommended that the Australian Government review the Draft EIS to thoroughly quantify impact mitigation for all places of Aboriginal heritage and cultural significance in the Camden LGA, resulting from the future operation of WSI.

2. Impacts on Non-Aboriginal Heritage

Of the Non-Aboriginal heritage impacts identified in the Draft EIS, Kirkham and Camden Park/Belgenny Farm were both assessed to have low impacts resulting from the future operation of WSI. The noise impact from aircraft flight paths is estimated as being under 60 dBA, while the closest flight path will be distantly visible for aircraft operating at greater than 10,000 feet. It is noted that no other Non-Aboriginal Heritage items have been analysed to this depth, with the Draft EIS stating that it is not possible to give precise predictions for every heritage item under the proposed flight paths, with impacts for locations such as Belgenny Farm only an 'estimation'.



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Listed on the NSW State Heritage Register (SHR), 'Maryland' is located in the Camden LGA, within a 10km radius of the WSI airport site at Badgerys Creek. However, despite its listing on the SHR and proximity to WSI and the proposed operating flight paths, no impact mitigation assessment in the Draft EIS is evident for the 'Maryland' site. Given the heritage significance of sites such as 'Maryland', a wholesale review of this part of the Draft EIS is warranted, to ensure that all heritage listed sites in the Camden LGA are thoroughly assessed and necessary mitigation measures resulting from future operation of the WSI flight paths are implemented.

Recommended that the Australian Government:

- Review and amend the Draft EIS to quantify impact mitigation for all places of Aboriginal heritage and cultural significance in the Camden LGA, resulting from the future operation of WSI; and
- Conduct a wholesale review of the Non-Aboriginal Heritage section of the Draft EIS, to ensure that all heritage listed sites in the Camden LGA are assessed and necessary mitigation measures resulting from the future operation of the WSI flight paths are implemented.

Social

Key issues for the Camden LGA

1. Social Impact Assessment Gaps

Review of the '*Draft EIS: Technical Paper 10 – Social*' revealed concerning gaps in the Australian Government's assessment of the social impacts resulting from WSI, not the least of which is the fact that the Draft EIS states only thirteen residents were interviewed in researching social impacts resulting from the operation of WSI (*page 59, Draft EIS: Technical Paper 10 - Social*). Of the approximately 1,200,000 people currently residing in the Western Parkland City, this represents just 0.00001% of the existing population having been directly consulted. The Draft EIS makes no reference to any interview conducted with residents from the Camden LGA community.

Pursuant to the significant under-representation of input to the Draft EIS from the community directly impacted by operation of WSI, following are a range of potential and/or perceived social impacts to the Camden LGA community that do not appear to be adequately identified or assessed in '*Draft EIS: Technical Paper 10 – Social*';

- Inadequate evaluation of the physical and perceived impacts of the operation of WSI (and resulting restrictions to access across the locality) to social cohesion and any associated community and cultural connections;
- No meaningful options developed for mitigation of the potential social concerns relating to the perceived or actual impacts of WSI to the local community's health (i.e. noise disturbance, fuel jettisoning etc.);



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- No consideration of the potential social concerns relating to airport related risks and hazards (i.e. terrorism, aircraft crashes etc.) e.g. no recommendation of education programs as to the inherent risks associated with living in/adjacent to an identified risk area;
- Limited assessment of the social implications of the locality changing from a rural and low-density residential area to a highly urbanised area. While the technical paper infers any transition would be a positive one (i.e. providing additional jobs and improved access to business opportunities), it may well be the case that different communities value varying levels of urbanisation differently. Therefore a change to a denser built form may be considered undesirable and stressful for some established and retired community members;
- Consideration of the degree and duration of the impacts to existing residents located in areas such as Bringelly during construction and operation of WSI i.e. construction noise, access and traffic congestion; and
- No analysis conducted of the implications of increased pressure on social services resulting from the WSI project, as well as impacts to housing availability and affordability due to worker relocation.

Based on this analysis it is evident that the degree of community engagement, particularly the Camden LGA community, is inadequate and does not represent the concerns of existing and future residents as to the adverse social impacts resulting from the operation of WSI. It is recommended that the Draft EIS is updated to reflect a more appropriate sample set of consultation from the Camden LGA community, and broader Western Parkland City, in conducting a thorough social impact assessment of WSI.

2. Social Impact Mitigation

As was the case for the EIS prepared on WSI in 2016, analysis conducted in the current Draft EIS (i.e. 'Chapter 18 of the Social Impact Assessment' and 'Technical Paper 10 - Social') for the mitigation of adverse impacts on social cohesion in the Camden LGA, and broader regional study area, is largely inadequate.

To highlight how the Draft EIS has failed the most adversely impacted communities, reference is made to 'Table 8.1 Preliminary management measures,' from the 'Draft EIS: Technical Paper 10 - Social';

Table 8.1 Preliminary management measures

ID No.	Issue	Mitigation measure	Owner	Timing
S1	Social impacts	The WSI CACG will undertake consultation with stakeholders and community, including social organisations, to seek feedback on social issues and to promote social and economic welfare of the community.	WSA Co	Pre-operation (Detailed design, 2024–2026)
S2	First Nations employment	WSA Co will implement a program to ensure opportunities for First Nations employment.	WSA Co	Operation (Implementation, 2026–ongoing)

Figure 21: (Source: Draft EIS: Technical Paper 10 - Social p.96 (Sept 2023))



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That the Draft EIS has consolidated the social impacts resulting from WSI into just two issues is of concern – the Draft EIS has sought to summarise a range of complex issues into just two dot points, with response action generalised as ‘ongoing’ consultation.

Clarification is sought as to why the Draft EIS identifies WSA Co. as the ‘owner’ of implementing the mitigation measures in addressing adverse social impacts resulting from WSI? To date, WSA Co. have had limited engagement with the Camden LGA community on the broader planning issues relating to WSI (i.e. they have only mostly focused information sessions regarding construction of WSI site at Badgerys Creek with the Liverpool LGA community).

To date there has been limited engagement with the Camden LGA community via mediums such as the ‘Forum on the Western Sydney Airport’ (FOWSA), and WSA Co’s quarterly ‘Stakeholder Planning Forums’.

WSI will change the social fabric of those communities that exist in its proximity. It is the responsibility of the Australian Government i.e. DITRDCA, not WSA Co (a ‘business enterprise’ of the Australian Government) to represent the best interests of these communities, including those in the Camden LGA, to ensure that the adverse social impacts resulting from WSI are comprehensively addressed.

3. Social Wellbeing of the Camden LGA Community

The Australian Government (via its Department of Social Services) has the stated mission to improve the wellbeing of individuals and families in Australian communities.

Department of Social Services



Australian Government
Department of Social Services

Vision and mission

[Department of Social Services mission is to improve the wellbeing of individuals and families in Australian communities.](#)

Source: *The Australian Government – Department of Social Services*

The operations of the WSI will not improve the wellbeing of individuals and families in the Camden LGA. As stated in ‘6.5 Health and Wellbeing’ of the *‘Draft EIS: Technical Paper 10 - Social’*, there will be adverse effects to the wellbeing of individuals and families resulting from WSI, including cardiovascular disease, lung and respiratory issues, mental health issues and other long-term health conditions. As per the Draft EIS, the intended mitigation measurements are as follows;



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8.3 Mitigation measures

Table 8.1 provides management and mitigation measures to address social impacts. The goal being to avoid, minimise or mitigate negative social impacts, and to maximise the identified positive impacts.

Table 8.1 Preliminary management measures

ID No.	Issue	Mitigation measure	Owner	Timing
S1	Social impacts	The WSI CACG will undertake consultation with stakeholders and community, including social organisations, to seek feedback on social issues and to promote social and economic welfare of the community.	WSA Co	Pre-operation (Detailed design, 2024–2026)

The only action is consultation. It is not evident this would achieve anything of merit in mitigating adverse health and wellbeing impacts to the Camden LGA community. Further, for WSA Co. to conduct this consultation appears inappropriate, as they have no vested interest in the wellbeing of individuals and families; this is the remit of the Australian Government's 'Department of Social Services'.

The assessment of community health and wellbeing impacts in the Draft EIS is disappointing. Its assessment of adverse impacts is highly subjective, with most ratings described as 'minimal,' 'minor' or 'moderate.' The Draft EIS requires wholesale review, and it is recommended that DITRDCA (i.e. not WSA Co.) facilitates this review in collaboration with the Department of Social Services and NSW Health, in looking after the health and wellbeing of the Camden LGA community, in mitigating adverse health impacts resulting from future operation of WSI.

4. Loss of Residential Amenity in the Camden LGA

The Draft EIS acknowledges that aircraft noise and changes to air quality during the day or night result in changes to the way of life for the community via a loss of residential amenity. The direct adverse impacts in the Camden LGA attributed to aircraft noise and poor air quality are addressed in other parts of this submission. However, their cumulative impacts are further responded to as follows, in the context of how they will change the lives of the Camden LGA community as a result of loss of residential amenity.

For example, in the context of aircraft noise, the Draft EIS repeatedly references adverse impacts associated only with people that reside in the ANEC 20 and ANEC 25 contour areas. Currently between the hours of 11:00pm and 5:00am, the ambient background noise across the Camden LGA is generally very low, particularly in contrast to other parts of the Sydney Metropolitan area. However, from 2026 when WSI commences operation under the RRO option, parts of the Camden LGA community will experience significant increases in background noise resulting from WSI aircraft operations throughout the night, every night. This occurrence will result in the significant loss of residential amenity for the Camden LGA community.

It is important that the Australian Government acknowledges that their WSI project will result in a loss of residential amenity in the Camden LGA, and that this is reflected and addressed in the Draft EIS. Statements by the Australian Government that "...people would become accustomed to aircraft noise" (page 18-20, Draft EIS: Part C - Environmental Impact Statement) are not particularly helpful in providing any assurance to the Camden LGA community as to the priority of their health and wellbeing over the operational requirements for WSI.



Recommended that the Australian Government:

- Consult with residents in the Camden LGA on the social impacts resulting from WSI, and update the Draft EIS to reflect a more appropriate sample set of consultation from across the broader Western Parkland City in conducting a comprehensive social impact assessment of WSI;
- Expand the Draft EIS (i.e. conducted by DITRDCA, not WSA Co.) to quantify all of the social impact issues on the Camden LGA community resulting from WSI, and that DITRDCA (not WSA Co.) facilitate consultation with the Camden LGA community in developing an action plan that fully responds to each of the social impact issues identified;
- Conduct a review of the Draft EIS and ‘*Technical Paper 10 – Social*’, and that DITRDCA (i.e. not WSA Co) facilitates this review in collaboration with the Department of Social Services and NSW Health, in looking after the health and wellbeing of the Camden LGA community, in mitigating adverse health impacts resulting from operation of WSI; and
- Acknowledge that the WSI project will result in a loss of residential amenity in the Camden LGA from the RRO operation, and that this is reflected and addressed in the Draft EIS.

Economic

Key issues for the Camden LGA

1. Economic Impact Methodology

The 2015 Draft EIS identified an adverse correlation between airport noise and land values in Brisbane and Adelaide; however, it did not make the same finding for land affected by Sydney and Melbourne airports. The Draft EIS posed a number of reasons for this result, including the fact that property values in the Sydney Metropolitan Area may be more significantly and positively influenced by factors other than noise, including proximity to Sydney CBD.

There are some risks associated with making conclusions that seek to draw the same correlation for the central Sydney Metropolitan Area between property prices and airport noise for WSI. Despite this, Chapter 24 of the 2015 Draft EIS states:

“Overall there would be no discernible negative impact expected on property values, as the anticipated value uplift from land use changes will outweigh any consequence or concern about noise impacts” Pg. 489

It is reasonable to note that the characteristics of land and properties impacted by the operation of WSI would be more akin to the localities surrounding Adelaide or Brisbane



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airports (i.e. land that is not located within a few kilometres of a Global CBD) resulting in a different correlation between noise and land values, compared to the Sydney airport analysis.

It is recommended that the Australian Government further review the current Draft EIS in analysing growth rates for properties affected by WSI being on par with other non-affected areas in Sydney. Whilst this may certainly be the case with respect to growth rates, there is likely to be very different actual sale value starting points i.e. lower land values in noise affected areas than non-affected areas consistent with the findings of other literature cited by the Draft EIS.

Recommended that the Australian Government:

- Review the Draft EIS in analysing growth rates for properties affected by WSI being on par with other non-affected areas in Sydney. Whilst this may certainly be the case with respect to growth rates, there is likely to be very different actual sale value starting points i.e. lower land values in noise affected areas than non-affected areas consistent with the findings of other literature cited by the Draft EIS.

Human Health

Key issues for the Camden LGA

1. Impacts for the Camden LGA Community

The 'Draft EIS: Technical Paper 12 – Human Health' currently falls short in assessing the impacts and effects of changes across a full range of environmental and social determinants of health, and the potential inequalities/equity issues due to the future operation of WSI. This is particularly the case for the Camden LGA community, as since development of the Airspace Design the extent of direct consultation with Camden LGA residents on social issues is unknown, as noted in the 'Social' section of this submission.

The level of analysis and detail presented in the Draft EIS should be reflective of the likely significance of the adverse social impacts resulting from WSI for the Camden LGA community. While much is made of the potential opportunities generated by WSI e.g. employment, there is especially limited examples provided of the adverse human health implications as a result of changes in qualities and characteristics of the Camden LGA (including land values in some proximities to the flight paths) and changes in recreational use, amenity of natural areas, access to greenspace and natural environments, and their associated health benefits.

Further to the previous point, findings from the Draft EIS should be presented in a way that helps to communicate the scale of the population affected, by determinant of health, and what the cumulative impacts are likely to be to the Camden LGA community from exposure to the combined hazards – there is currently no clear analysis/summary of the cumulative adverse impacts to human health in the Draft EIS.



2. WSI Health Hazard Warning

Regarding the 'Draft EIS: Part C - Environmental Impact Assessment (Chapter 20. Human Health),' reference is made to the following statement regarding human health and changes in air quality resulting from the future operation of WSI;

"The assessment undertaken has not identified any risk issues of concern in relation to impacts on community health in the local study area." and;

"In addition to the above, no risk issues of concern in relation to community health has been identified in relation to changes in regional air quality" (page 20-1).

Statements such as these are misleading and questionable in fact, through an absence of balanced supporting evidence.

A desktop review of online information pertaining to aircraft emissions, resulting changes to air quality and subsequent human health impacts are readily available. For example, the United States (US) Government's 'National Center for Biotechnology Information' article titled "A Systematic Review of The Impact of Commercial Aircraft Activity on Air Quality Near Airports" reveals an extensive repository of information relating to the adverse implications to air quality resulting from airports such as the proposed WSI. The report states the following:

"Commercial airport activity can adversely impact air quality in the vicinity of airports, and millions of people live close to major airports in the United States. Because of these potential impacts, a systematic literature review was conducted to identify peer reviewed literature on air quality near commercial airports and assess the quality of the studies. The systematic review included reference database searches in PubMed, Web of Science, and Google Scholar, inclusive of years 2000 through 2020. We identified 3,301 articles, and based on the inclusion and exclusion criteria developed, seventy studies were identified for extraction and evaluation using a combination of supervised machine learning and manual screening techniques.

These studies consistently showed that ultrafine particulate matter (UFP) is elevated in and around airports. Furthermore, many studies show elevated levels of particulate matter under 2.5 microns in diameter (PM_{2.5}), black carbon, criteria pollutants, and polycyclic aromatic hydrocarbons as well. Finally, the systematic review, while not focused on health effects, identified a limited number of on-topic references reporting adverse health effects impacts, including increased rates of premature death, pre-term births, decreased lung function, oxidative DNA damage and childhood leukemia. More research is needed linking particle size distributions to specific airport activities, and proximity to airports, characterizing relationships between different pollutants, evaluating long-term impacts, and improving our understanding of health effects".

Source: [A Systematic Review of The Impact of Commercial Aircraft Activity on Air Quality Near Airports - PMC \(nih.gov\)](https://pubmed.ncbi.nlm.nih.gov/36111111/)

The United States has a significantly greater number of large operating airports in comparison to Australia, thus having an extensive database on which to derive 'real-world' analysis of the impacts on an airport's surrounds, including to both human and environmental receptors. The likelihood is that operation of WSI may generate the same level of hazards to human health as identified in the aforementioned US study. Consequently, the Draft EIS must appropriately reflect the possible hazards to human



health for residents in the Camden LGA and broader Western Parkland City resulting from poor air quality generated by operation of WSI.

3. Air Quality and Noise Impacts on Human Health

While the 'Draft EIS: Technical Paper 12 – Human Health' provides a general overview of the impact assessment approach to preparing the Draft EIS for WSI, it is not clear what baseline incidence rates were used in conducting these assessment. For example, if a general baseline such as Sydney rates were used, rather than rates for the Liverpool or the Camden LGAs, this may have resulted in an underestimation of risks to human health.

While risks were estimated for 2033 and 2055 snapshots (for each pollutant) in the Draft EIS, an overview of the expected scale of impacts resulting from the combined effect of all pollutants was not presented. This information should be provided to convey a picture of the total risk to human health for exposed communities, including residents in the Camden LGA.

The Draft EIS does not adequately reflect community feedback, perceptions or concerns of the residents potentially impacted by the future operation of WSI – as noted previously in this submission, consultation with just thirteen residents does not represent appropriate community consultation (page 59, Draft EIS: Technical Paper 10 - Social). Comprehensive community feedback on health concerns should be thoroughly quantified in the Draft EIS, with commentary on how this feedback was considered and addressed in the EIS assessment process. Where community comments have not been incorporated or addressed an explanation justifying this should be presented. If there were no specific comments or concerns about health impacts/effects or some determinants of health then this should also be explicitly stated.

It is noteworthy on the issue of adverse impacts to human health arising from issues such as air quality and noise, that perception effects are different from biological or epidemiological risks. Perception effects can cause stress and anxiety in people, and should be considered separately from mortality and morbidity effects. The reality is that a portion of the community impacted by poor air quality and aircraft noise will suffer from these perception effects. The Australian Government has not adequately discussed this in the Draft EIS, nor quantified mitigation measures - an outline of these measures (i.e. an air quality management framework or plan) should be provided in the human health Technical Paper accompanied by an explanation on how and to what extent these measures will mitigate the identified adverse health impacts.

It is recommended that the Australian Government review the Draft EIS to include a qualitative analysis and discussion of impacts/risks/effects on vulnerable/sensitive groups and on health inequality/equity issues in the Camden LGA community resulting from future operation of WSI.

4. Sleep Disturbance Impacts on Human Health

Reference is made to the following extract from 'Draft EIS: Technical Paper 12 – Human Health' regarding sleep disturbance;



6.5.2.3 Sleep disturbance

In relation to aircraft noise, the WHO recommends that noise in the community as L_{night} should not exceed 40 dB(A), and L_{max} should not exceed 52 dB(A) to protect against sleep disturbance issues. It is noted that the L_{night} levels in the existing environment already exceed 40 dB(A), with levels measured at the NMTs in the range 41 to 58 dB(A).

Review of L_{night} levels predicted from aircraft operations has identified a number of receptors where the threshold of 40 dB(A) is exceeded in 2033 and 2055.

Review of L_{max} levels at night time predicted from aircraft operations has identified a significant number of receptors where the threshold of 52 dB(A) is exceeded in 2055.

As there are a number of exceedances, further assessment of sleep disturbance impacts is required and presented in Section 6.5.3.

Figure 22: (Source: Draft EIS: Technical Paper 12 - Human Health p.102 (Sept 2023))

The highlighted statement in *Figure 22* is disputed on the basis that no evidence is provided to substantiate such a claim, and that the probability of its accuracy is highly questionable based on the characteristics of the selected area. For example, in reference to 'Draft EIS: Technical Paper 12 – Human Health', table 6.3 on page 103 depicts only two locations within the Camden LGA (Cobbitty and Rossmore) identified for evaluation of high sleep disturbance. Currently the area of Rossmore is predominantly rural, therefore it is very unlikely that its "existing environment already exceed 40db(A)" between the hours of 11:00pm and 5:00am.

As stated in the Draft EIS Technical Paper, "The most significant health impact identified...is sleep disturbance". The adverse impacts associated with sleep disturbance are well documented in the Draft EIS, and can include cognitive impairment (children), cardio-vascular disease and morbidity. The Australian Government has a responsibility to the health and wellbeing of the Camden LGA community, in ensuring it is not subject to such adverse health impacts resulting from operation of WSI. In this regard it is recommended that the Draft EIS is updated to include all of the evidence (data) that supports the claims made by the Australian Government regarding impacts on sleep disturbance (e.g. table 6.3 on page 103 of 'Draft EIS: Technical Paper 12 – Human Health') and that sleep disturbance impact evaluation is expanded to other areas in the Camden LGA in addition to Cobbitty and Rossmore i.e. other impacted suburbs along the RRO flightpath.



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Recommended that the Australian Government:

- Review and update the Draft EIS to quantify and reflect the impacts to the Camden LGA community resulting from WSI, particularly the cumulative adverse impacts to human health;
- Ensure the Draft EIS appropriately reflects a warning as to the possible hazards to human health for residents in the Camden LGA and broader Western Parkland City resulting from poor air quality generated by operation of WSI;
- Review the Draft EIS to include a qualitative analysis and discussion of impacts/risks/effects on vulnerable/sensitive groups and on health inequality/equity issues to the Camden LGA community resulting from future operation of WSI; and
- Update the Draft EIS to include all of the evidence (data) that supports the claims made regarding impacts on sleep disturbance (e.g. table 6.3 on page 103 of '*Draft EIS: Technical Paper 12 – Human Health*') and that sleep disturbance impact evaluation is expanded to other areas in the Camden LGA in addition to Cobbitty and Rossmore i.e. other impacted suburbs along the RRO flightpath.

Facilitated Changes

Key issues for the Camden LGA

1. Impact on Camden Airport Operations

Camden Airport's ongoing operation continues as an important hub of activity in the Camden LGA, in the context of its role in the aviation industry, as well its important contribution to the local economy. Given the close proximity of Camden Airport to the WSI site, analysis of the associated impacts in the Draft EIS regarding airspace management are noted. However, what is needed in the Draft EIS is a 'plain English' explanation of the impacts that operation of WSI will have on small aircraft flights to/from Camden Airport.

For example, the following map from the Draft EIS depicts a sample of activity of aircraft operating out of Camden Airport;



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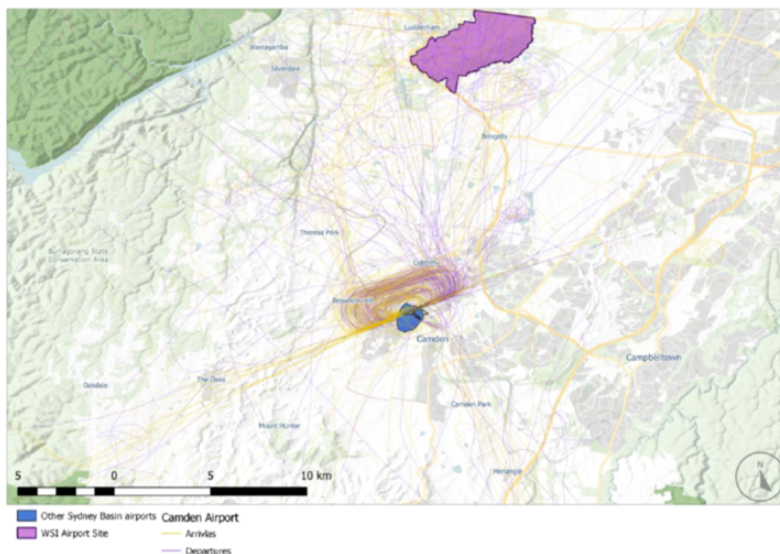


Figure 21.7 Current flight tracks for Camden Airport for a one week period of March 2019

Western Sydney International – Airspace and flight path design
Draft Environmental Impact Statement | Chapter 21 Facilitated impacts 21-13

Figure 23: (Source: Draft EIS: Part C - Environmental Impact Assessment p.21-13 (Sept 2023))

In presenting a comparison that is easy to understand, the Draft EIS should provide a similar map that depicts aircraft movement to/from Camden Airport, once WSI commences operation in 2026. This should provide the Camden LGA community with a clearer understanding of how WSI will influence local aircraft movement to/from Camden Airport.

In addition to a before/after mapped comparison, a plain English explanation is also needed as to whether changes to Camden Airport's operation as a consequence of WSI will result in an increase in local light aircraft noise (e.g. if light aircraft are required to fly lower over the Camden LGA, in avoiding WSI airspace), and if so, what areas in the Camden LGA are adversely affected. The location of a modified flight training area suggests there will be an increase in low altitude overflying and flight training exercises occurring in areas not previously exposed to this activity, including Camden South, Elderslie, Spring Farm and Mount Annan. The flight training may include spins, stalls and steep turns that involve large variations in power and flight path. Modified IFR arrival and departure routes for Camden Airport may also expose previously unaffected areas to aircraft noise, but this is not made clear in the Draft EIS. These changes could result in an increase in community concern as well as enquiries and complaints to Council, over which it has no jurisdiction for dealing with such matters.

An increase in local aircraft noise, compounded by 24-hour, 7-day operation of heavy aircraft from WSI, would be a significant issue of concern that requires clear explanation in the Draft EIS.



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2. Bankstown Airport Flight Paths

The Draft EIS indicates that changes to the Bankstown Airport 'Instrument Flight Rule' (IFR) would result in an increased frequency and concentration of overflight aircraft. This increase in aircraft movements equates to approximately 145 movements per day, particularly for arriving aircraft.

These changes to IFR flight procedures will result in a direct impact on Camden LGA residents, as depicted in the following extract from the Draft EIS;

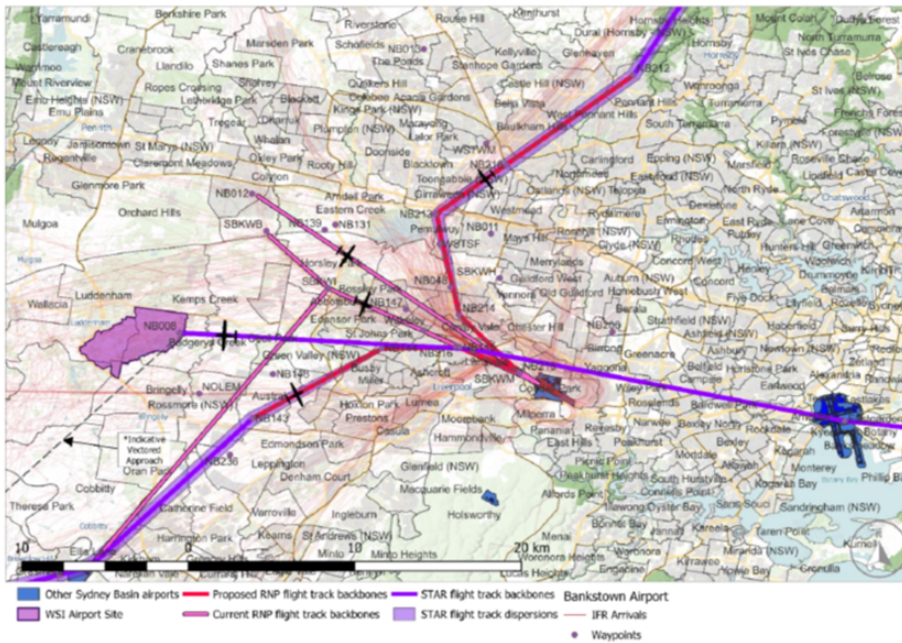


Figure 21.22 Proposed STARs at Bankstown Airport and integrated RNP approaches – Current (red) versus Proposed track dispersion with suburb overlay

Figure 24: (Source: Draft EIS: Part C - Environmental Impact Assessment p.21-35 (Sept 2023))

What is not adequately quantified in the Draft EIS is to what extent the increased aircraft movements to Bankstown Airport will have on Camden LGA residents i.e. it is recommended that the Australian Government determine the extent of increased noise impacts, pollution, the duration and operating times for the 145 aircraft arrival movements to Bankstown Airport and update the Draft EIS to reflect these impacts and any needed mitigation assessment required.

3. Impact from Unlicensed Airport Operations

Further to the points identified in Council’s submission regarding the impacts for Camden Airport’s ongoing operation, there is also noteworthy concern regarding the operation of ‘unlicensed’ airports in proximity to WSI, throughout the Greater Sydney Basin and surrounds.

In reference to the Draft EIS, study data excludes air traffic movements from the ‘unlicensed’ operational airports that are within an 85km radius of WSI, including airports at;



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- Wedderburn;
- Wilton;
- Mittagong;
- The Oaks;
- Somersby; and
- Mangrove Mountain.

The unlicensed status of the aforementioned airports reflects the regulatory standard to which they operate, however this does not provide a valid rationale as to why the air traffic movements from these airports are excluded from the study data. Exclusion of aircraft movements from 'unlicensed' airports in any risk analysis based only on low volume numbers is flawed, in that it takes only one flight in any risk profile to generate the potential for an incident. Air traffic from these 'unlicensed' airports may operate to, from and within the airspace above the Camden LGA. Consequently, the flight path modelling and risk analysis reflected in the Draft EIS is compromised by the omission of these data.

It is recommended that the Australian Government review and update the Draft EIS to ensure the 'Facilitated Changes' analysis includes all potential impacts from aircraft movements associated with licensed civil and military airports, as well as all 'unlicensed' airports in operating proximity to WSI.

Recommended that the Australian Government:

- Update the Draft EIS to include a 'plain English' explanation of the impacts that operation of WSI will have on small aircraft flights to/from Camden Airport, and whether these impacts will result in an increase in light aircraft noise adversely impacting Camden LGA residents;
- Determine the extent of increased noise impacts, pollution, the duration and operating timing for the 145 aircraft arrival movements to Bankstown Airport, and update the Draft EIS to quantify these impacts on the Camden LGA and any needed mitigation assessment required; and
- Review and update the Draft EIS to ensure the 'Facilitated Changes' analysis includes all potential impacts from aircraft movements associated with licensed civil and military airports, as well as all 'unlicensed' airports in operating proximity to WSI.

Cumulative Impacts

Key issues for the Camden LGA

1. Cumulative Impacts on the Camden LGA

The Draft EIS identifies that cumulative impacts from operation of WSI will be the result of incremental, sustained and combined effects of actions associated with the development, many of which will have a negative impact. However, what is not quantified in the Draft



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EIS is the cumulative impacts on the Camden LGA community resulting from the operation of WSI in conjunction with Sydney Kingsford-Smith Airport (KSA).

It is of concern that the Australian Government is intending to adversely impact the Camden LGA community through operation of WSI without due regard to existing impacts associated with the operation of KSA. Instead, the Draft EIS indicates it is too difficult to quantify the cumulative impacts, stating on page 22-1 of the *'Draft Environmental Impact Assessment'*;

"In many cases, the quantitative assessment of issues is difficult, due to the large study area, the indirect nature of potential impacts and the lack of sufficient baseline data relative to some impacts".

This assessment of the cumulative impacts for WSI is not acceptable. Further review of the Draft EIS is required, along with preparation of an updated EIS for KSA, to transparently quantify the cumulative impacts from operation of both airports on the broader Western Parkland City. Not conducting this cumulative impact assessment infers that the Australian Government designed WSI airspace so as not to adversely alter KSA airspace impacts, thus promoting a social divide between Western Sydney and Eastern Sydney.

Recommended that the Australian Government:

- Review the Draft EIS, along with preparation of an updated EIS for KSA, to transparently quantify the cumulative impacts from operation of both airports on the Camden LGA and broader Western Parkland City.

Camden Council - Budget Review for the Quarter Ending 31 December 2023					Attachment 1
Summary of Budget Review Variations Greater than \$20,000					
Expense \$	Change In Vote		Description	Comments	
	Income \$	Totals \$			
1) Proposed Budget Variations				Legend:	
Proposed variations to the 2023/24 Budget based on income received and expenditure payments to date are as follows:				Expense Reduction - Positive figures, Expense Increase (Negative Figure) Income Increase - Positive figures, Income Reduction (Negative figure)	
-	150,000	150,000	Civic Centre - Operational Income	The Camden Civic Centre's income estimates for the 2023/24 financial year were based on a projected six month closure for the Civic Centre major refurbishment project. Due to delays in the funding body executing the WestInvest grant agreement, the Centre will remain open with a revised closure date estimated to be May 2024. This adjustment reflects the increase in projected income while the Civic Centre remains open.	
(80,000)	-	(80,000)	Digital Technology - Cyber Security Action Plan Initiatives	Council has an adopted Cyber Resilience Strategy which supports its three-year Cyber Security Action Plan. This budget allocation is required to fund the ongoing costs of implementing the action plan and continue to mitigate the strategic and operational risks arising from cyber-security.	
(32,000)	-	(32,000)	Variations under \$20,000*		
(112,000)	150,000	38,000	Surplus / (Deficit) - December Proposed Budget Variations		
2) Council Approved Budget Variations				Legend:	
For the Period 1 October to 31 December 2023, Council has authorised the following changes to the budget:				Expense Reduction - Positive figures, Expense Increase (Negative Figure) Income Increase - Positive figures, Income Reduction (Negative figure)	
185,000	(185,000)	-	Acceptance of Grant Funding - NSW Flood Recovery and Resilience Grant Program	Ordinary Council Meeting 10 October 2023 - Resolution ORD176/23	
3,500	-	(3,500)	South West Sydney Academy of Sports - Annual Contribution	Ordinary Council Meeting 10 October 2023 - Resolution ORD179/23	
2,392,784	(2,392,784)	-	Acknowledgement of Grant Funding - NSW Severe Weather and Flooding - Essential Public Asset Reconstruction Works	Ordinary Council Meeting 14 November 2023 - Resolution ORD198/23	
1,000,000	(1,000,000)	-	Acceptance of Grant Funding - Greater Cities and Regional Sports Facility Fund - Kirkham Rugby League Oval.	Ordinary Council Meeting 14 November 2023 - Resolution ORD199/23	
10,000	-	(10,000)	Community Grants Program 2023/2024	Ordinary Council Meeting 14 November 2023 - Resolution ORD200/23	
15,000	(15,000)	-	Acceptance of Grant Funding - Saving Our Species Program - Camden White Gum	Ordinary Council Meeting 12 December 2023 - Resolution ORD224/23	
3,606,284	(3,592,784)	(13,500)	Surplus / (Deficit) - Council Approved Budget Variations		

Camden Council - Budget Review for the Quarter Ending 31 December 2023					Attachment 1
Summary of Budget Review Variations Greater than \$20,000					
Expense \$	Change In Vote		Description	Comments	
	Income \$	Totals \$			
3) Proposed Contra Adjustments					
Proposed Contra adjustments that have a NIL impact on Council's Budget:				Legend: Expense Reduction - Positive figures, Expense Increase (Negative Figure) Income Increase - Positive figures, Income Reduction (Negative figure)	
11,606,305	-	-	Leppington - Design of Roads Including Byron Road, Heath Rd, Ingleburn and Rickard	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.	
-	(70,500)	-	Developer Contributions Reserve - Transfer from Reserve		
-	(11,535,805)	-	Grant Income - NSW State Government		
6,401,703	-	-	Leppington/AIF - Dickson Road and Town Centre Entry	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.	
-	(6,401,703)	-	Grant Income - NSW State Government		
5,436,813	-	-	Leppington - Heath Road - Camden Valley Way to Dickson Road - Design and Construction	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.	
-	(5,436,813)	-	Developer Contributions Reserve - Transfer from Reserve		
4,141,315	-	-	CSP3 - Harrington Park Reserve Facility Upgrade	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.	
-	(4,141,315)	-	Community Support Package Stage 3 - Loan Proceeds		
3,057,176	-	-	Leppington/WIG - Leppington Scalabrini East / Pat Kontista - Construction & Improvement Works	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes. The project has also been impacted by delays in the execution of WestInvest funding agreements	
-	(1,939,574)	-	Developer Contributions Reserve - Transfer from Reserve		
-	(1,117,602)	-	Grant Income - NSW State Government		
2,625,970	-	-	CSP3 - New Open Space at Crest - Stage 1	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.	
-	(2,625,970)	-	Developer Contributions Reserve - Transfer from Reserve		
2,345,417	-	-	Leppington/WIG - Scalabrini North - Leppington Town Centre Open Space and Riparian Corridor	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes. The project has also been impacted by delays in the execution of WestInvest funding agreements	
-	(2,345,417)	-	Grant Income - NSW State Government		
(2,320,307)	-	-	Biodiversity Reserve - Transfer to Reserve	The Part B Biodiversity Credit payments (\$2.320 million) are proposed to be transferred to a new internal cash reserve (Biodiversity Credits Reserve).	
-	2,320,307	-	Biodiversity Credits Sales - Gundungurra Reserve		
2,314,478	-	-	Leppington - Byron Road - Ingleburn Rd to Heath Rd - Construction	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.	
-	(2,314,478)	-	Developer Contributions Reserve - Transfer from Reserve		

Camden Council - Budget Review for the Quarter Ending 31 December 2023					Attachment 1
Summary of Budget Review Variations Greater than \$20,000					
Expense \$	Change In Vote		Totals \$	Description	Comments
	Income \$				
2,114,000	-		-	WestInvest - Camden Town Centre Enhancements - John Street Public Domain Upgrade and Activation	There has been a delay to the commencement of projects funded by WestInvest primarily due to delays in the execution of funding agreements
-	(2,114,000)			Grant Income - NSW State Government	
1,547,587	-		-	Leppington - Woolgen Park Road Design and Construction	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.
-	(1,547,587)			Grant Income - NSW State Government	
1,453,003	-		-	Turner Road Riparian and Local Park Project	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.
-	(1,453,003)			Developer Contributions Reserve - Transfer from Reserve	
1,424,832	-		-	Leppington North Stages - Open Space Design	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.
-	(1,424,832)			Developer Contributions Reserve - Transfer from Reserve	
1,321,756	-		-	CSP3 - Hilder Reserve Sportsfield - Construction	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.
-	(871,756)			Developer Contributions Reserve - Transfer from Reserve	
-	(450,000)			Community Support Package Stage 3 - Loan Proceeds	
1,125,880	-		-	Leppington Scalabrini South/West - Design/Construction	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.
-	(1,125,880)			Developer Contributions Reserve - Transfer from Reserve	
1,086,695	-		-	CSP3 - Nugget Beams Reserve: Sportsfield, Amenities and Seating	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.
-	(861,695)			Developer Contributions Reserve - Transfer from Reserve	
-	(225,000)			Community Support Package Stage 3 - Loan Proceeds	
1,035,000	-		-	CSP3 - Narellan Sports Hub - Hockey Amenities	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.
-	(35,000)			CSP3 Loan Reserve - Transfer from Reserve	
-	(1,000,000)			Community Support Package Stage 3 - Loan Proceeds	
1,003,488	-		-	CSP3 - Cowpasture Reserve Softball: Design and Refurb Amenities Bldg.	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.
-	(413,488)			Grant Income - NSW State Government	
-	(590,000)			Community Support Package Stage 3 - Loan Proceeds	

Camden Council - Budget Review for the Quarter Ending 31 December 2023					Attachment 1
Summary of Budget Review Variations Greater than \$20,000					
Expense \$	Change In Vote		Totals \$	Description	Comments
	Income \$				
948,740	-		-	Ingham Reserve Embellishment (includes road realignment)	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.
-	(948,740)			Developer Contributions Reserve - Transfer from Reserve	
900,000	-		-	Camden Cemetery - Masterplan Works	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.
-	(900,000)			Cemetery Reserve - Transfer From Reserve	
850,000	-		-	CSP3 - Hybrid or Synthetic Turf Business Case and Implementation	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.
-	(850,000)			Community Support Package Stage 3 - Loan Proceeds	
849,059	-		-	CSP3 - Fairfax Reserve Sportsfield and Irrigation Improvements, Change Room Facilities	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.
-	(79,059)			CSP3 Loan Reserve - Transfer from Reserve	
-	(770,000)			Community Support Package Stage 3 - Loan Proceeds	
806,000	-		-	Leppington - Leppington Stages - Transport Infrastructure Design	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.
-	(806,000)			Developer Contributions Reserve - Transfer from Reserve	
800,000	-		-	WestInvest - Narellan Town Centre Improvements	There has been a delay to the commencement of projects funded by WestInvest primarily due to delays in the execution of funding agreements.
-	(800,000)			Grant Income - NSW State Government	
774,700	-		-	CSP3/WestInvest - Camden Civic Centre Renewal and Upgrade	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes. The project has also been impacted by delays in the execution of WestInvest funding agreements.
-	(1,000,000)			Community Support Package Stage 3 - Loan Proceeds	
-	225,300			Grant Income - NSW State Government	
650,000	-		-	WestInvest - Camden Animal Shelter and Community Education Hub	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes. The project has also been impacted by delays in the execution of WestInvest funding agreements.
-	(650,000)			Grant Income - NSW State Government	
611,700	-		-	CSP3 - Cawdor Road Shared Path	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.
-	(611,700)			Grant Income - NSW State Government	
465,975	-		-	CSP3 - Hostile Vehicle Mitigation Works for Events	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.
-	(465,975)			CSP3 Loan Reserve - Transfer from Reserve	

Camden Council - Budget Review for the Quarter Ending 31 December 2023					Attachment 1
Summary of Budget Review Variations Greater than \$20,000					
Expense \$	Change In Vote		Totals \$	Description	Comments
	Income \$				
398,000	-		-	WestInvest - Cut Hill Reserve Sports Field Redevelopment	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes. The project has also been impacted by delays in the execution of WestInvest funding agreements.
-	(398,000)			Grant Income - NSW State Government	
298,350	-		-	Leppington - Leppington Scalabrini North Drainage Planning/Design	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.
-	(298,350)			Developer Contributions Reserve - Transfer from Reserve	
295,999	-		-	Leppington - Leppington Precinct Drainage Planning	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.
-	(295,999)			Developer Contributions Reserve - Transfer from Reserve	
290,000	-		-	Elderslie - Kirkham Sportsground Amenities	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.
-	(290,000)			Developer Contributions Reserve - Transfer from Reserve	
(139,600)	-		-	Corporate Salaries - Biodiversity Workforce Allocation	As part of the Councillor briefing 19 September 2023 recommendation was made that funding from the sale of the Biodiversity Credits (Biodiversity reserve) be allocated to staffing and projects aligned to Biodiversity outcomes.
(85,000)	-			Capital Expenditure Plant Purchase	
(20,000)	-			Urban Forest Community Engagement	
(40,000)	-			Biodiversity Education and Engagement	
-	284,600			Biodiversity Reserve - Transfer from Reserve	
277,000	-		-	Leppington - Leppington Town Centre Roads	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.
-	(277,000)			Developer Contributions Reserve - Transfer from Reserve	
240,000	-		-	CSP3 - Birriwa Reserve Football/Cricket - Sportsfield and Buildings	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.
-	(240,000)			Community Support Package Stage 3 - Loan Proceeds	
225,000	-		-	Kirkham Park Renewal (Play Equipment and Embellishment) CIRP	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.
-	(225,000)			Asset Renewal Reserve - Transfer From Reserve	
202,500	-		-	WestInvest - Camden Community Nursery	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes. The project has also been impacted by delays in the execution of WestInvest funding agreements.
-	(202,500)			Grant Income - NSW State Government	
(200,000)	-		-	Local Roads and Community Infrastructure Program - Jack Nash Reserve Tennis Court Upgrade	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.
-	200,000			Grant Income - NSW State Government	

Camden Council - Budget Review for the Quarter Ending 31 December 2023					Attachment 1
Summary of Budget Review Variations Greater than \$20,000					
Expense \$	Change In Vote		Description	Comments	
	Income \$	Totals \$			
100,000	-	-	Spring Farm Sportsground Design & Investigation	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.	
-	(100,000)	-	Developer Contributions Reserve - Transfer from Reserve		
(80,000)	-	-	Kirkham Park Amenities Building - SEC Cloud locking System	Funding required for the amenities building alterations and SEC Cloud locking system. Funding is to be sourced through developer contributions.	
-	80,000	-	Developer Contributions Reserve - Transfer from Reserve		
(76,700)	-	-	Corporate Salaries - Workforce Management Initiatives	Funding is proposed for workforce management and wellbeing initiatives and proactive management of injury management. Funding is to be sourced through risk management incentive rebates provided by Council's insurer.	
-	76,700	-	Work Health and Safety Reserve - Transfer From Reserve		
67,048	-	-	Leppington - Leppington Precinct Open Space - Design	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.	
-	(67,048)	-	Developer Contributions Reserve - Transfer from Reserve		
(50,000)	-	-	Stormwater Management - Purcell Street Drainage Investigation	Funding proposed for Purcell Street drainage investigation and maintenance plan. Funding is available within Council's Stormwater Management Levy Reserve.	
-	50,000	-	Stormwater Levy - Transfer from Reserve		
49,300	-	-	WestInvest - Ultimate Nature Challenge - Wild and Free	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes. The project has also been impacted by delays in the execution of WestInvest funding agreements.	
-	(49,300)	-	Grant Income - NSW State Government		
(30,000)	-	-	Stormwater Management - Studley Park Drainage Investigation	Funding proposed for Studley Park drainage investigation and maintenance plan. Funding is available within Council's Stormwater Management Levy Reserve.	
-	30,000	-	Stormwater Levy - Transfer from Reserve		
(20,000)	-	-	Onslow Park Renewal Program (Replacement of Equipment and Embellishment) - CIRP	The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes.	
-	20,000	-	Asset Renewal Reserve - Transfer From Reserve		
57,079,182	(57,079,182)	0	Surplus / (Deficit) - December 2023 Proposed Contra Adjustments		



Camden Council

Quarterly Budget Review Statement

For the period ending 31 December 2023

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6. Consultancy & Legal Expenses Budget Review Statement

Camden Council

Quarterly Budget Review Statement
for the period 01/10/23 to 31/12/23**INCOME & EXPENSE****BUDGET REVIEW FOR THE QUARTER ENDED 31 DECEMBER 2023**

(\$000's)	Original Budget	Approved Changes			Revised Budget	Proposed Variations this Qtr	Forecast Adjustments *	Notes	Projected Year End Result	Actual YTD
		Revotes	Other than by QBRs	Sep QBRs						
Income from Continuing Operations										
Rates and Annual Charges	100,287	-	-	-	100,287	-	-	-	100,287	100,256
User Charges and Fees	19,878	9	13	-	19,900	150	-	1	20,050	9,498
Interest & Investment Revenue	10,374	-	-	2,518	12,892	-	-	-	12,892	7,580
Other Revenues	1,251	-	-	-	1,251	2,320	-	2	3,571	647
Other Income	2,652	-	-	-	2,652	-	5,000	-	7,652	1,486
Grants & Contributions for Operating Purposes	8,581	1,339	3,239	785	13,944	-	-	-	13,944	2,543
Grants & Contributions for Capital Purposes - Cash	79,300	10,892	11,314	1,975	103,481	(27,762)	-	3	75,719	15,016
Contributions for Capital Purposes - Non Cash	83,212	-	-	-	83,212	-	-	-	83,212	22,317
Total Income from Continuing Operations	305,535	12,240	14,566	5,278	337,619	(25,292)	5,000		317,327	159,343
Expenses from Continuing Operations										
Employee Costs	63,763	-	222	1,515	65,500	217	-	4	65,717	34,207
Borrowing Costs	1,839	-	-	(60)	1,779	-	-	-	1,779	476
Materials and Contracts	58,676	6,163	3,297	665	68,801	220	(5,000)	5	64,021	30,881
Depreciation	32,175	-	-	-	32,175	-	-	-	32,175	16,088
Other Expenses	1,752	-	14	56	1,822	32	-	6	1,854	2,528
Total Expenses from Continuing Operations	158,205	6,163	3,533	2,176	170,077	469	(5,000)		165,546	84,180
Net Operating Result from Continuing Operations	147,330	6,077	11,033	3,102	167,542	(25,761)	10,000		151,781	75,164
Net Operating Result for the year before Grants and Contributions provided for Capital Purposes										
Surplus/(Deficit)	(15,182)	(4,815)	(281)	1,127	(19,151)	2,001	10,000		(7,150)	37,831
Reconciliation to Budget										
Net Operating Result for the Year	147,330	6,077	11,033	3,102	167,542	(25,761)	10,000		151,781	75,164
Less:										
Capital Purchases & Acquisitions	221,380	46,883	21,953	6,935	297,151	(59,755)	-		237,396	71,804
Borrowing Expense (Principal)	3,376	-	-	14	3,390	-	-		3,390	1,789
Transfer to Restricted Assets	61,464	-	-	1,935	63,399	2,320	5,000		70,719	22,600
	286,220	46,883	21,953	8,884	363,940	(57,435)	5,000		311,505	96,193
Add:										
Non Cash Funded Items	32,175	-	-	-	32,175	-	(5,000)		27,175	16,088
Funds from the Sale of Assets	465	-	-	-	465	-	-		465	203
Loan Borrowings	16,450	-	-	-	16,450	(9,266)	-		7,184	-
Transfer from Restricted Assets	89,800	40,806	10,906	5,782	147,294	(22,370)	-		124,924	50,486
	138,890	40,806	10,906	5,782	196,384	(31,636)	(5,000)		159,748	66,777
Net Budget Position - Surplus / (Deficit)	-	-	(14)	-	(14)	38	-		24	45,747

* Note

The following forecast adjustments have been identified, however they do not require Council approval at this stage:
Fain Value Adjustment for Investment Properties (\$5M) and Estimated Operating Revotes into 2024/25 (\$5M).

Camden Council

Quarterly Budget Review Statement
for the period 01/10/23 to 31/12/23

INCOME & EXPENSE**Recommended changes to revised budget**

Budget Variations being recommended include the following material items:

Notes	Details
1	<p>User Fees and Charges - Increase in Income</p> <p>Additional projected income of \$150k from Civic Centre operations. Due to delays in executing the WestInvest grant funding agreement, the Centre will remain open with a revised closure date estimated to be May 2024.</p>
2	<p>Other Revenue - Increase in Income</p> <p>This adjustment reflects receipt of income for Part B Biodiversity credit sales of \$2,320k .</p>
3	<p>Grants & Contributions for Capital Purposes - Decrease in Income</p> <p>LRCI Round 4 Grant funding adjustment for Jack Nash Reserve Court Upgrade \$200k for works that were programmed for 2024/25 but will now be undertaken in 2023/24. Reduction of grant income of \$27,962k (decrease) relating to the cash flow timing adjustment for the capital works program.</p>
4	<p>Employee Costs - Increase in Expense</p> <p>Increase in allocation for corporate salaries for Workforce Management Initiatives (\$77k) and resourcing of biodiversity programs (\$140k).</p>
5	<p>Materials and Contracts - Increase in Expense</p> <p>Cyber security action plan initiatives \$80k , biodiversity program \$60k and Purcell Street and Studley Park Drainage Investigation \$80k</p>
6	<p>Other Expenses - Increase in Expense</p> <p>A number of minor budget adjustments less than \$20,000.</p>

Camden Council

Quarterly Budget Review Statement
for the period 01/10/23 to 31/12/23**CAPITAL BUDGET REVIEW**

BUDGET REVIEW FOR THE QUARTER ENDED 31 DECEMBER 2023									
(\$'000's)	Original Budget	Approved Changes			Revised Budget	Proposed Variations this Qtr	Notes	Projected Year End Result	Actual YTD
		Revotes	Other than by QBRs	Sep QBRs					
Capital Expenditure									
New Assets									
- Transport & Road Infrastructure	36,890	21,762	2,817	1,998	63,467	(31,581)	1	31,886	6,512
- Stormwater & Drainage	674	142	271	-	1,087	(594)	2	493	131
- Parks & Playgrounds	15,000	2,272	-	-	17,272	(7,272)	3	10,000	-
- Recreation & Community Facilities	55,013	14,459	11,766	3,605	84,843	(16,232)	4	68,611	29,545
- Plant & Equipment	4,525	1,281	-	-	5,806	85	5	5,891	1,475
- Council Properties	3,317	2,644	-	50	6,011	(3,956)	6	2,055	138
- Information Technology New	757	1,602	-	757	3,116	-	-	3,116	108
New Assets (Works in Kind)									
- Transport & Road Infrastructure	42,614	-	-	-	42,614	-	-	42,614	11,275
- Stormwater & Drainage	13,611	-	-	-	13,611	-	-	13,611	8,790
- Parks & Playgrounds	1,108	-	-	-	1,108	-	-	1,108	-
- Recreation & Community Facilities	25,879	-	-	-	25,879	-	-	25,879	2,252
Renewal Assets (Replacement)									
- Transport & Road Infrastructure	14,745	489	3,960	171	19,365	-	-	19,365	7,902
- Stormwater & Drainage	51	45	-	50	146	-	-	146	6
- Parks & Playgrounds	2,078	294	947	-	3,319	-	-	3,319	1,511
- Recreation & Community Facilities	953	570	1,455	-	2,978	(205)	7	2,773	607
- Council Properties	4,165	725	732	304	5,926	-	-	5,926	1,503
- Information Technology Replacement	-	598	5	-	603	-	-	603	49
Total Capital Expenditure	221,380	46,883	21,953	6,935	297,151	(59,755)		237,396	71,804
Capital Funding									
Rates & Other Untied Funding	3,246	-	-	272	3,518	-	-	3,518	4,886
Capital Grants & Contributions	48,832	10,892	11,314	1,975	73,013	(27,762)	-	45,251	5,262
Reserves:									
- External Restrictions	65,803	22,450	9,598	3,405	101,256	(21,128)	-	80,128	28,207
- Internal Restrictions	3,372	13,541	1,041	1,283	19,237	(1,599)	-	17,638	10,929
New Loans	16,450	-	-	-	16,450	(9,266)	-	7,184	-
Receipts from Sale of Assets:									
- Plant & Equipment	465	-	-	-	465	-	-	465	203
S7.11 Works in Kind Income (Non Cash)	44,882	-	-	-	44,882	-	-	44,882	3,534
Infrastructure Dedicated under s80A	38,330	-	-	-	38,330	-	-	38,330	18,783
Total Capital Funding	221,380	46,883	21,953	6,935	297,151	(59,755)		237,396	71,804
Net Capital Funding - Surplus / (Deficit)	-	-	-	-	-	-		-	-

Camden Council

Quarterly Budget Review Statement
for the period 01/10/23 to 31/12/23**CAPITAL BUDGET REVIEW****Recommended changes to revised budget**

Budget Variations being recommended include the following material items:

Notes	Details
1	<p>Transport & Road Infrastructure (New Assets) - Decrease in Expense</p> <p>The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes and result in a reduction in the Capital Works Program in 2023/24 of \$31,581K.</p>
2	<p>Stormwater & Drainage (New Assets) - Decrease in Expense</p> <p>The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes and result in a reduction in the Capital Works Program in 2023/24 of \$594K.</p>
3	<p>Parks & Playgrounds (New Assets) - Decrease in Expense</p> <p>The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes and result in a reduction in the Capital Works Program in 2023/24 of \$7,272K.</p>
4	<p>Recreation & Community Facilities (New Assets) - Decrease in Expense</p> <p>The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes and result in a reduction in the Capital Works Program in 2023/24 of \$16,312K. Funding required for the amenities building alterations and SEC Cloud locking system \$80K</p>
5	<p>Plant & Equipment (New Assets) - Increase in Expense</p> <p>Capital Expenditure Plant Purchase to support maintenance at Gundungarra Reserve</p>
6	<p>Council Properties (New Assets) - Decrease in Expense</p> <p>The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes and result in a reduction in the Capital Works Program in 2023/24 of \$3,956K.</p>
7	<p>Recreation & Community Facilities (Renewal) - Decrease in Expense</p> <p>The cash flow for the projects included within this section have been rephased based on detailed project scopes and designs. The revised estimates are aligned with anticipated construction timeframes and result in a reduction in the Capital Works Program in 2023/24 of \$205K.</p>

Camden Council

CASH & INVESTMENTS**BUDGET REVIEW FOR THE QUARTER ENDED 31 DECEMBER 2023**

(\$000's)	Original Budget	Approved Changes			Revised Budget	Proposed Variations this Qtr	Projected Year End Result
		Revotes	Other than by QBRS	Sep QBRS			
Externally Restricted							
Section 7.11 Developer Contributions	157,072	(22,736)	(570)	(3,186)	130,580	21,128	151,708
Domestic Waste Management	12,884	-	-	13	12,897	-	12,897
Specific Purpose Unexpended Grants	8,721	(1,537)	(4,226)	1,510	4,468	-	4,468
Stormwater Management Levy	654	(139)	(82)	(50)	383	(80)	303
Total Externally Restricted	179,331	(24,412)	(4,878)	(1,713)	148,328	21,048	169,376
Internally Restricted							
Admin Building Reserve	350	(116)	-	-	234	-	234
Asset Renewal Reserve*	140	(90)	-	-	50	205	255
BEP and Town Farm Reserve	368	(331)	-	-	37	-	37
Biodiversity Credits Reserve	-	-	-	-	-	2,035	2,035
Camden Parking Improvements Reserve	121	-	-	(121)	-	-	-
Camden Regional Economic Taskforce Reserve	50	-	-	(50)	-	-	-
Capital Works Reserve*	1,323	(697)	(221)	-	405	-	405
Cemetery Improvements	2,267	(536)	-	-	1,731	900	2,631
Commercial Waste Management	2,042	-	-	-	2,042	-	2,042
Loan Reserve	5,409	(4,763)	-	-	646	580	1,226
Contributions Reserve	971	(10)	-	(405)	556	-	556
Elections Reserve	455	-	-	-	455	-	455
Employee Leave Entitlements	2,354	-	-	-	2,354	-	2,354
Engineering Deposits Reserve	211	-	-	-	211	-	211
Expenditure Revotes Reserve	6,265	(6,265)	-	-	-	-	-
Family Day Care Reserve	77	-	-	-	77	-	77
Plant Replacement Reserve	3,105	(1,190)	4	-	1,919	-	1,919
Public Appeal Reserve	14	-	-	-	14	-	14
Risk Management	125	(10)	-	-	115	-	115
Stormwater Works (General Fund)	74	(68)	-	-	6	-	6
Technology Improvements Reserve	1,920	(1,662)	-	(257)	1	-	1
Technology Replacement Reserve	932	(200)	-	(500)	232	-	232
Unexpended Financial Assistance Grant Reserve	4,916	-	(4,916)	-	-	-	-
Water Savings Action Plan	174	-	-	-	174	-	174
Working Funds Reserve *	1,292	(456)	-	(801)	35	-	35
Work Health & Safety Reserve	412	-	-	-	412	(77)	335
Total Internally Restricted	35,367	(16,394)	(5,133)	(2,134)	11,706	3,643	15,349
Total Cash & Investments	214,698	(40,806)	(10,011)	(3,847)	160,034	24,691	184,725

* The uncommitted balance of the Capital Works Reserve will be \$634,551, Asset Renewal Reserve will be \$49,775 and the Working Funds Reserve will be \$34,854 if Council adopt the recommendation of this report.

Cash & Investments Statement

Investments have been invested in accordance with Council's Investment Policy.

The Cash at Bank amount for this period has been reconciled to Council's physical Bank Statements. The date of completion of this bank reconciliation is 31/12/23

Camden Council

Quarterly Budget Review Statement
for the period 01/10/23 to 31/12/23**CONTRACTS****BUDGET REVIEW FOR THE QUARTER ENDED 31 DECEMBER 2023****Contracts Listing** - contracts entered into during the quarter

Contractor	Contract detail & purpose	Contract Value	Start Date	Duration of Contract	Budgeted Y/N
Centium Pty Ltd RSM Australia	Internal Audit Services for three internal audits during FY2023/2024	\$64,344	10/10/23	8 months	Y
Avijohn Contracting Pty	Centennial Lane - Heavy patch & spray seal	\$95,442	11/10/23	3 months	Y
Elite Turf Projects Pty Ltd	Nugget Beams – Sport field Improvement works	\$102,872	02/11/23	16 months	Y
Mack Civil Pty Ltd	Sedgwick Street Footpath	\$83,488	10/11/23	< 1 month	Y
Royal Flush Plumbing Pty Ltd	Jack Brabham Reserve Solar and Electrification	\$51,080	14/11/23	5 weeks	Y
Nepean Engineering	Laser Cut Panels - Public Art Project	\$59,750	15/11/23	1 month	Y
Gauci Civil Contracting Pty Ltd	Concrete Restoration July 2023 Works Package	\$53,688	24/11/23	6 months	Y
Elemental Architecture Pty Ltd	Design Consultancy Services Camden Animal Shelter & Community Nursery	\$1,182,648	27/11/23	32 months	Y
Fully Charged Learning Pty Ltd	Staff Professional Development Program	\$136,400	11/12/23	6 months	Y
Lamond Contracting Pty Ltd	Landscaping & Planting Nepean River Trail Camden Town Farm	\$340,102	15/12/23	4 months	Y
STIHL Pty Ltd	Supply And Delivery of Various Small Plant Items For Camden Council	\$106,247	16/12/23	6 months	Y
Toro Australia Group Sales Pty Ltd	Seven (7) Ride on Mowers	\$266,585	16/12/23	4 months	Y
Independent Property Valuations Pty Ltd	Valuation and Land Value Index Updates	\$60,000	19/12/23	3 years	Y
WesTrac Pty Ltd	Supply and Delivery of 1 X Motor Grader for Camden Council	\$468,443	20/12/23	4 months	Y

Notes:

1. Minimum reporting level is 1% of estimated income from continuing operations of Council or \$50,000 - whatever is the lesser.
2. Contracts listed are those entered into during the quarter being reported and exclude contractors on Council's Preferred Supplier list.
3. Contracts for employment are not required to be included.

Camden Council

Quarterly Budget Review Statement
for the period 01/10/23 to 31/12/23

KEY PERFORMANCE INDICATORS

BUDGET REVIEW FOR THE QUARTER ENDED 31 DECEMBER 2023						
(\$000's)	Current Projection		Original Budget	Actuals		Graphs
	Amounts	Indicator		Prior Periods		
	23/24	23/24	23/24	22/23	21/22	

NSW Local Government Industry Key Performance Indicators (OLG):

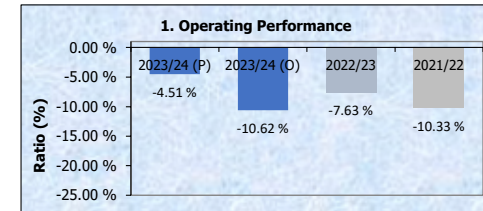
1. Operating Performance

Operating Revenue (excl. Capital) - Operating Expenses	-	7,150	-4.51%	-10.62%	-7.63%	-10.33%
Operating Revenue (excl. Capital Grants & Contributions)		158,396				

This ratio measures Council's achievement of containing operating expenditure within operating revenue.

Comment: This ratio includes forecast adjustments as displayed on page 1

Benchmark: > 0.00%

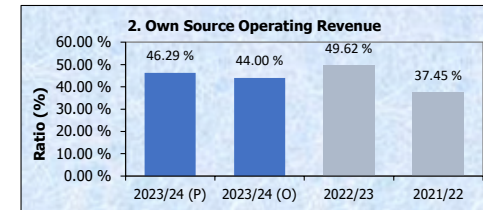


2. Own Source Operating Revenue

Operating Revenue (excl. ALL Grants & Contributions)		144,452	46.29%	44.00%	49.62%	37.45%
Total Operating Revenue (incl. Capital Grants & Cont)	0	312,049				

This measures the degree of reliance on external funding sources such as operating grants & contributions

Benchmark: > 60.00%

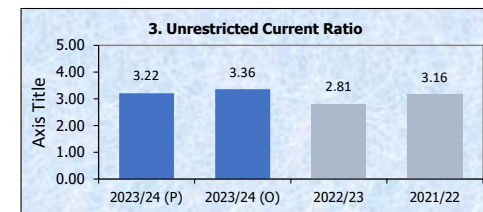


3. Unrestricted Current Ratio

Current Assets less all External Restrictions		33,804	3.22	3.36	2.81	3.16
Current Liabilities less Specific Purpose Liabilities		10,513				

The ability to meet short term financial obligations such as loans, payroll and leave entitlements.

Benchmark: > 1.5x



Camden Council

Quarterly Budget Review Statement
for the period 01/10/23 to 31/12/23

KEY PERFORMANCE INDICATORS

BUDGET REVIEW FOR THE QUARTER ENDED 31 DECEMBER 2023

(\$000's)	Current Projection		Original Budget	Actuals Prior Periods		Graphs
	Amounts	Indicator				

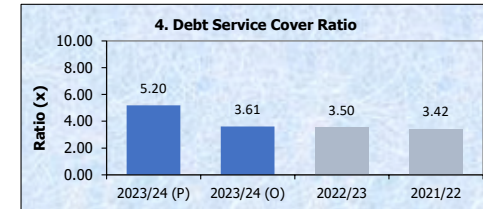
NSW Local Government Industry Key Performance Indicators (OLG):

4. Debt Service Cover Ratio

Operating Result before Interest & Dep. exp (EBITDA)	26,864	5.20	3.61	3.50	3.42
Principal Repayments + Borrowing Interest Costs	5,169				

This ratio measures the availability of operating cash to service debt including interest, principal and lease payments.

Benchmark: > 2x

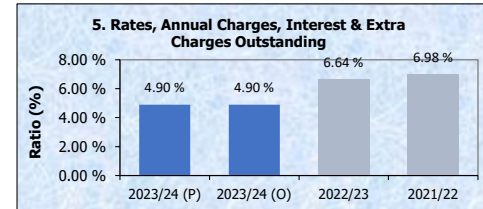


5. Rates, Annual Charges, Interest & Extra Charges Outstanding

Rates, Annual & Extra Charges Outstanding	4,914	4.90%	4.90 %	6.64 %	6.98 %
Rates, Annual & Extra Charges Collectible	100,287				

To assess the impact of uncollected rates and annual charges on Council's liquidity.

Benchmark: < 5% metro

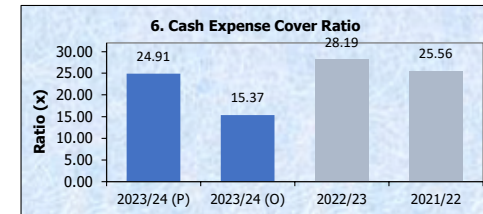


6. Cash Expense Cover Ratio

Current Year's Cash & Cash Equivalents (incl. Term Deposits)	293,874	24.91	15.37	28.19	25.56
Operating & financing activities Cash Flow payments	141,551				

This liquidity ratio indicates the number of months a Council can continue paying for its immediate expenses without additional cash inflow.

Benchmark: > 3 mths



Camden Council

Quarterly Budget Review Statement
for the period 01/10/23 to 31/12/23

KEY PERFORMANCE INDICATORS

BUDGET REVIEW FOR THE QUARTER ENDED 31 DECEMBER 2023

(\$000's)	Current Projection		Original Budget	Actuals Prior Periods		Graphs
	Amounts	Indicator				

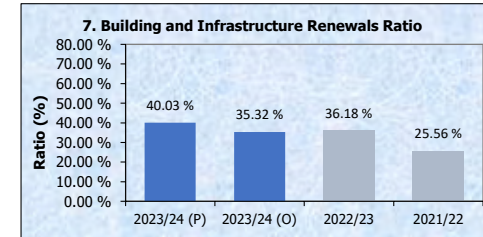
NSW Local Government Infrastructure Asset Performance Indicators (OLG):

7. Building and Infrastructure Renewals Ratio

Asset Renewals (Building, Infrastructure & Other Structures)	10,262	40.03 %	35.32 %	36.18 %	25.56 %
Depreciation, Amortisation & Impairment	25,634				

To assess the rate at which these assets are being renewed relative to the rate at which they are depreciating.
Note: Depreciation is under review

Benchmark: >= 100.00%

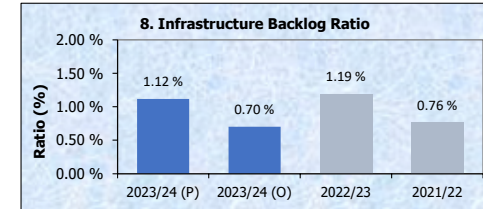


8. Infrastructure Backlog Ratio

Estimated cost to bring Assets to a satisfactory condition	21,800	1.12 %	0.70 %	1.19 %	0.76 %
Total value of Infrastructure, Building, Other Structures & depreciable Land Improvement Assets	1,950,409				

This ratio shows what proportion the backlog is against the total value of a Council's infrastructure.

Benchmark: < 2.00%

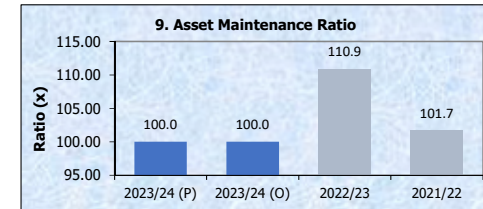


9. Asset Maintenance Ratio

Actual Asset Maintenance	4,929	100.00	100.00	110.89	101.69
Required Asset Maintenance	4,929				

Compares actual vs. required annual asset maintenance. A ratio above 1.0 indicates Council is investing enough funds to stop the Infrastructure Backlog growing.

Benchmark: > 100%



Camden Council

Quarterly Budget Review Statement
for the period 01/10/23 to 31/12/23

KEY PERFORMANCE INDICATORS

BUDGET REVIEW FOR THE QUARTER ENDED 31 DECEMBER 2023

(\$000's)	Current Projection		Original Budget	Actuals Prior Periods	Graphs
	Amounts	Indicator			

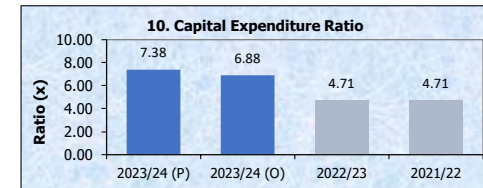
NSW Local Government Infrastructure Asset Performance Indicators (OLG):

10. Capital Expenditure Ratio

Annual Capital Expenditure	237,396	7.38	6.88	4.71	4.71
Annual Depreciation	32,175				

To assess the extent to which a Council is expanding its asset base through capital expenditure on both new assets and the replacement and renewal of existing assets.

Benchmark: > 1



Camden Council

Quarterly Budget Review Statement
for the period 01/10/23 to 31/12/23

CONSULTANCY & LEGAL EXPENSES

BUDGET REVIEW FOR THE QUARTER ENDED 31 DECEMBER 2023

Expense	YTD Expenditure	Budgeted Y/N
Consultancies	\$3,591,241	Y
Legal Fees	\$673,546	Y

Definition of a consultant:

A consultant is a person or organisation engaged under contract on a temporary basis to provide recommendations or high level specialist or professional advice to assist decision making by management. Generally it is the advisory nature of the work that differentiates a consultant from other contractors.



**Investment Summary Report
November 2023**



Camden Council

Executive Summary - November 2023

Investment Holdings

	Amount (\$)	Current Yield (%)
Cash	14,500,000	4.35
Term Deposit	296,200,000	5.06
Total	310,700,000	

Term to Maturity

	Amount (\$)		Policy Max
Between 0 and 1 years	310,200,000	100%	100% ✓
Between 1 and 3 years	500,000	0%	60% ✓
Total	310,700,000		

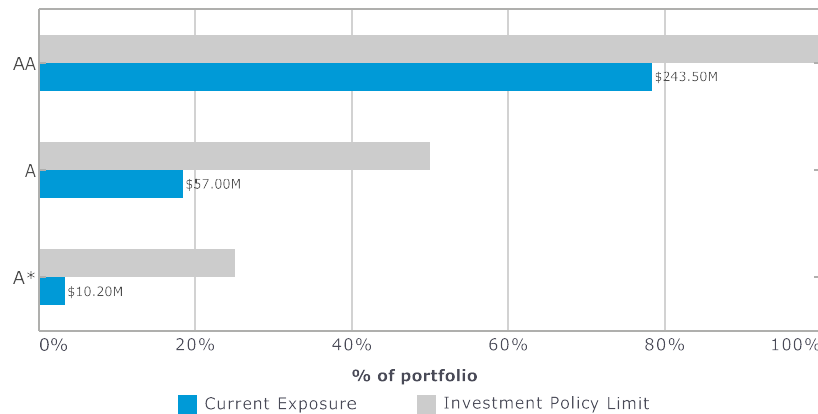
Percentages in this report may not add up to 100% due to rounding

Sources of Funds

	Amount (\$)
Section 7.11 Developer Contributions	181,994,524
Restricted Grant Income	65,908,163
Externally Restricted Reserves	15,634,126
Internally Restricted Reserves	30,724,818
General Fund	16,438,369
Total Funds Invested	310,700,000

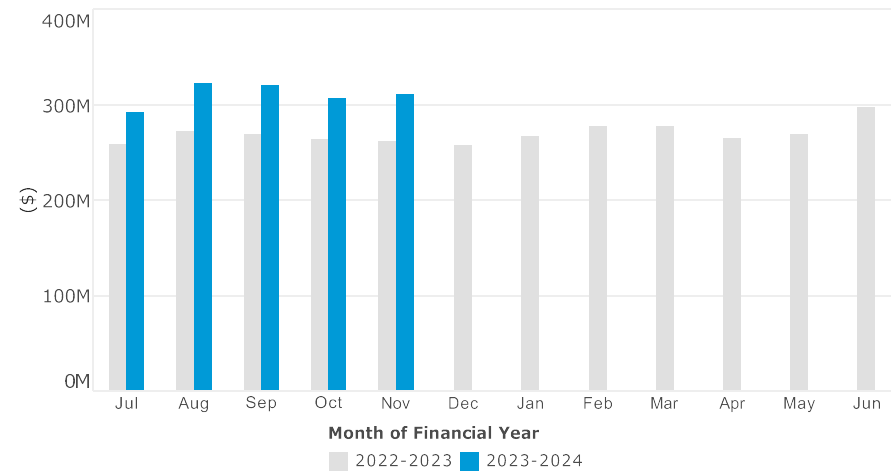
Council's investment portfolio has increased by \$4.2M since the October reporting period. The increase primarily relates to additional grant funding received and the receipt of rate income as second instalments fell due at the end of November.

Total Credit Exposure



*Council's investment policy limits investments in foreign subsidiary banks which are monitored by APRA to a maximum 25% of the total portfolio

Investment Portfolio Balance



Camden Council

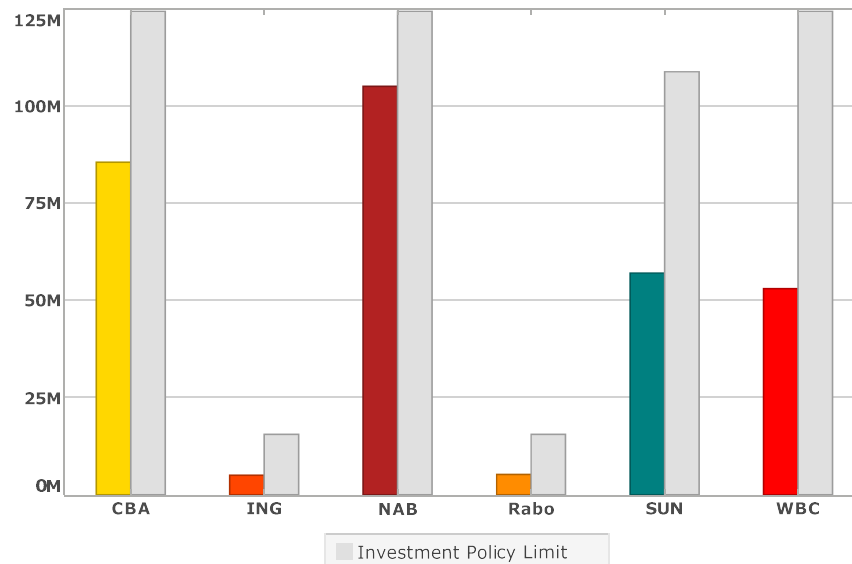
Individual Institutional Exposures Report - November 2023



Individual Institutional Exposures

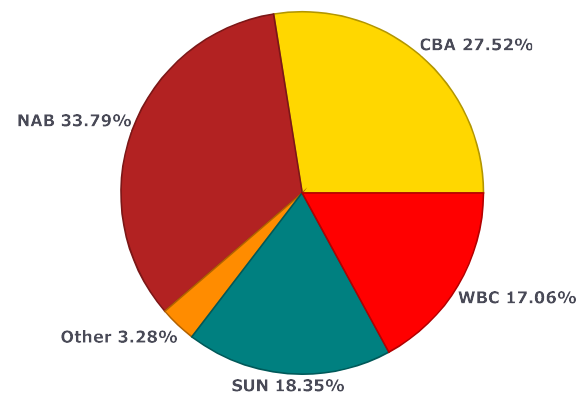
	Current Exposures		Policy Limit		Capacity
Commonwealth Bank of Australia (AA-)	85.50M	27.52%	124.28M	40.00%	38.78M
ING Bank Australia [Foreign Sub] (A*)	5.00M	1.61%	15.54M	5.00%	10.54M
National Australia Bank (AA-)	105.00M	33.79%	124.28M	40.00%	19.28M
Rabobank Aus [Foreign Sub] (A+*)	5.20M	1.67%	15.54M	5.00%	10.34M
Suncorp Bank (A+)	57.00M	18.35%	108.75M	35.00%	51.74M
Westpac Group (AA-)	53.00M	17.06%	124.28M	40.00%	71.28M
	310.70M				

Individual Institutional Exposure Charts



*Council's investment policy limits investments in foreign subsidiary banks which are monitored by APRA to a maximum 5% of the total portfolio in any single entity

Council's portfolio is within its individual institutional investment policy limits.
 Council's portfolio is within its term to maturity investment policy limits.
 Council's portfolio complies with the NSW Ministerial Investment Order.



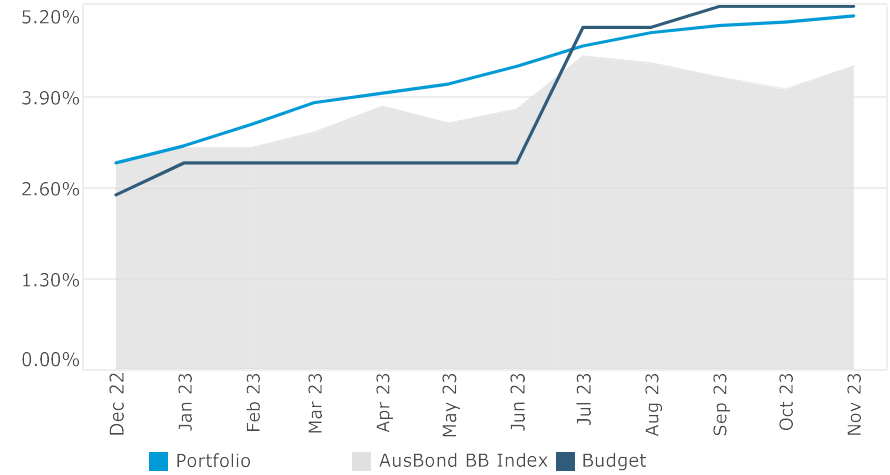


Camden Council

Performance Summary - November 2023

Interest Summary Investment Performance

Interest Summary as of November 2023	
Number of Investments	60
Average Days to Maturity	174
Weighted Portfolio Yield	5.06%
CBA Call Account	4.35%
Highest Rate	5.56%
Lowest Rate	0.80%
Budget Rate	5.20%
Average BBSW (30 Day)	4.27%
Average BBSW (90 Day)	4.38%
Average BBSW (180 Day)	4.69%
Official Cash Rate	4.35%
AusBond Bank Bill Index	4.34%



Interest Received During the 2023/2024 Financial Year				
	November	Cumulative	Original Budget	Revised Budget
General Fund	\$320,337	\$1,540,944	\$1,839,000	\$2,422,000
Restricted	\$981,202	\$4,730,308	\$8,285,000	\$10,220,000
Total	\$1,301,539	\$6,271,252	\$10,124,000	\$12,642,000

Historical Performance Summary (%pa)			
	Portfolio	AusBond BB Index	Outperformance
Nov 2023	5.06%	4.34%	0.72%
Last 3 months	4.99%	4.18%	0.81%
Last 6 months	4.79%	4.19%	0.60%
Financial Year to Date	4.88%	4.28%	0.60%
Last 12 months	4.19%	3.76%	0.43%

Investment Performance

Council's portfolio returned 5.06%pa on a weighted average yield basis during November. This compares favourably with the Ausbond Bank Bill Index's return of 4.34%pa for the month.





Camden Council

Investment Holdings Report - November 2023

Cash Accounts

Amount (\$)	Current Yield (%)	Institution	Credit Rating	Current Value (\$)	Deal No.	Reference
14,500,000.00	4.35%	Commonwealth Bank of Australia	AA-	14,500,000.00	535548	
14,500,000.00				14,500,000.00		

Term Deposits

Maturity Date	Amount (\$)	Rate	Institution	Credit Rating	Purchase Date	Amount plus Accrued Int (\$)	Deal No.	Accrued Interest (\$)	Coupon Frequency	Reference
6-Dec-23	5,000,000.00	4.55%	Commonwealth Bank of Australia	AA-	12-Dec-22	5,220,643.84	543647	220,643.84	At Maturity	3662
11-Dec-23	2,000,000.00	3.15%	National Australia Bank	AA-	19-Dec-18	2,059,893.15	537431	59,893.15	Annually	3070
13-Dec-23	5,000,000.00	5.40%	National Australia Bank	AA-	26-Jun-23	5,116,876.71	544225	116,876.71	At Maturity	3689
18-Dec-23	4,500,000.00	3.15%	National Australia Bank	AA-	19-Dec-18	4,634,759.59	537432	134,759.59	Annually	3071
18-Dec-23	5,000,000.00	4.54%	National Australia Bank	AA-	31-Jan-23	5,189,063.01	543733	189,063.01	At Maturity	3668
3-Jan-24	2,000,000.00	3.40%	Rabobank Australia	A+*	4-Jan-19	2,061,665.75	537443	61,665.75	Annually	3173
8-Jan-24	5,000,000.00	4.82%	Commonwealth Bank of Australia	AA-	4-Jan-23	5,100,246.19	543680	100,246.19	SemiAnnually	3663
15-Jan-24	5,000,000.00	4.80%	Commonwealth Bank of Australia	AA-	10-Jan-23	5,099,830.23	543692	99,830.23	SemiAnnually	3664
24-Jan-24	5,000,000.00	4.98%	National Australia Bank	AA-	21-Feb-23	5,193,060.27	543848	193,060.27	At Maturity	3670
31-Jan-24	5,000,000.00	5.00%	National Australia Bank	AA-	21-Feb-23	5,193,835.62	543849	193,835.62	At Maturity	3671
7-Feb-24	6,000,000.00	4.83%	Commonwealth Bank of Australia	AA-	8-Feb-23	6,235,015.89	543800	235,015.89	At Maturity	3669
14-Feb-24	5,000,000.00	5.02%	National Australia Bank	AA-	21-Feb-23	5,194,610.96	543850	194,610.96	At Maturity	3672
21-Feb-24	5,000,000.00	5.00%	National Australia Bank	AA-	28-Feb-23	5,189,041.10	543871	189,041.10	At Maturity	3673
28-Feb-24	1,000,000.00	3.20%	Rabobank Australia	A+*	28-Feb-19	1,024,197.26	537586	24,197.26	Annually	3189
28-Feb-24	6,000,000.00	5.00%	National Australia Bank	AA-	2-Mar-23	6,225,205.48	543885	225,205.48	At Maturity	3674
4-Mar-24	1,200,000.00	3.20%	Rabobank Australia	A+*	4-Mar-19	1,228,405.48	537601	28,405.48	Annually	3192
6-Mar-24	5,000,000.00	5.44%	Westpac Group	AA-	19-Jul-23	5,100,602.74	544324	100,602.74	At Maturity	3698
11-Mar-24	5,000,000.00	4.91%	Westpac Group	AA-	8-Mar-23	5,180,257.53	543914	180,257.53	At Maturity	3675
18-Mar-24	5,000,000.00	4.52%	National Australia Bank	AA-	17-Apr-23	5,141,172.60	544023	141,172.60	At Maturity	3677
20-Mar-24	5,000,000.00	5.13%	Suncorp Bank	A+	28-Nov-23	5,002,108.22	544671	2,108.22	At Maturity	3725
27-Mar-24	1,000,000.00	3.00%	Rabobank Australia	A+*	29-Mar-19	1,020,301.37	537765	20,301.37	Annually	3200
27-Mar-24	5,000,000.00	5.34%	National Australia Bank	AA-	1-Aug-23	5,089,243.84	544345	89,243.84	At Maturity	3700
3-Apr-24	5,000,000.00	4.60%	Westpac Group	AA-	31-Mar-23	5,154,383.56	543975	154,383.56	At Maturity	3676



Camden Council Investment Holdings Report - November 2023

Maturity Date	Amount (\$)	Rate	Institution	Credit Rating	Purchase Date	Amount plus Accrued Int (\$)	Deal No.	Accrued Interest (\$)	Coupon Frequency	Reference
8-Apr-24	5,000,000.00	4.62%	Westpac Group	AA-	1-May-23	5,135,435.62	544054	135,435.62	At Maturity	3678
15-Apr-24	5,000,000.00	4.62%	Westpac Group	AA-	1-May-23	5,135,435.62	544055	135,435.62	At Maturity	3679
24-Apr-24	5,000,000.00	5.02%	Commonwealth Bank of Australia	AA-	29-May-23	5,127,906.85	544132	127,906.85	At Maturity	3681
1-May-24	5,000,000.00	5.15%	Commonwealth Bank of Australia	AA-	5-Jun-23	5,126,280.82	544159	126,280.82	At Maturity	3685
8-May-24	5,000,000.00	5.56%	National Australia Bank	AA-	3-Jul-23	5,115,008.22	544283	115,008.22	At Maturity	3693
8-May-24	5,000,000.00	5.56%	National Australia Bank	AA-	7-Jul-23	5,111,961.64	544301	111,961.64	At Maturity	3694
13-May-24	5,000,000.00	5.12%	Suncorp Bank	A+	9-Oct-23	5,037,172.60	544568	37,172.60	At Maturity	3715
15-May-24	5,000,000.00	5.56%	National Australia Bank	AA-	7-Jul-23	5,111,961.64	544302	111,961.64	At Maturity	3695
22-May-24	5,000,000.00	5.50%	Suncorp Bank	A+	13-Jul-23	5,106,232.88	544317	106,232.88	At Maturity	3696
29-May-24	5,000,000.00	5.50%	National Australia Bank	AA-	26-Jun-23	5,119,041.10	544226	119,041.10	At Maturity	3690
29-May-24	7,500,000.00	5.40%	National Australia Bank	AA-	1-Aug-23	7,635,369.86	544346	135,369.86	At Maturity	3701
5-Jun-24	10,000,000.00	5.07%	Commonwealth Bank of Australia	AA-	1-Jun-23	10,254,194.52	544143	254,194.52	At Maturity	3682
12-Jun-24	5,000,000.00	5.50%	National Australia Bank	AA-	26-Jun-23	5,119,041.10	544227	119,041.10	At Maturity	3691
19-Jun-24	5,000,000.00	5.37%	Suncorp Bank	A+	30-Nov-23	5,000,735.62	544681	735.62	At Maturity	3726
19-Jun-24	5,000,000.00	5.50%	Commonwealth Bank of Australia	AA-	27-Jun-23	5,118,287.67	544228	118,287.67	At Maturity	3692
26-Jun-24	5,000,000.00	5.51%	National Australia Bank	AA-	24-Jul-23	5,098,123.29	544332	98,123.29	At Maturity	3699
3-Jul-24	5,000,000.00	5.54%	Commonwealth Bank of Australia	AA-	16-Aug-23	5,081,202.74	544399	81,202.74	At Maturity	3704
10-Jul-24	5,000,000.00	5.41%	Commonwealth Bank of Australia	AA-	29-Aug-23	5,069,663.01	544438	69,663.01	At Maturity	3708
17-Jul-24	5,000,000.00	5.45%	Suncorp Bank	A+	17-Jul-23	5,102,280.82	544319	102,280.82	At Maturity	3697
24-Jul-24	5,000,000.00	5.45%	Suncorp Bank	A+	8-Nov-23	5,017,171.23	544626	17,171.23	At Maturity	3721
30-Jul-24	10,000,000.00	5.51%	Commonwealth Bank of Australia	AA-	21-Aug-23	10,153,978.08	544402	153,978.08	At Maturity	3705
7-Aug-24	5,000,000.00	5.37%	Suncorp Bank	A+	13-Nov-23	5,013,241.10	544636	13,241.10	At Maturity	3722
14-Aug-24	5,000,000.00	5.55%	Commonwealth Bank of Australia	AA-	8-Aug-23	5,086,836.73	544362	86,836.73	SemiAnnually	3702
21-Aug-24	7,500,000.00	5.23%	Westpac Group	AA-	14-Aug-23	7,518,269.18	544386	18,269.18	Quarterly	3703
28-Aug-24	5,000,000.00	5.22%	National Australia Bank	AA-	23-Aug-23	5,071,506.85	544417	71,506.85	At Maturity	3706
4-Sep-24	5,000,000.00	5.21%	National Australia Bank	AA-	4-Sep-23	5,062,805.48	544456	62,805.48	At Maturity	3710
11-Sep-24	5,000,000.00	5.25%	National Australia Bank	AA-	11-Sep-23	5,058,253.42	544501	58,253.42	At Maturity	3711
18-Sep-24	5,000,000.00	5.16%	Westpac Group	AA-	18-Sep-23	5,052,306.85	544512	52,306.85	Quarterly	3713
23-Sep-24	5,000,000.00	5.27%	Westpac Group	AA-	25-Sep-23	5,048,368.49	544524	48,368.49	At Maturity	3714

Camden Council

Investment Holdings Report - November 2023



Maturity Date	Amount (\$)	Rate	Institution	Credit Rating	Purchase Date	Amount plus Accrued Int (\$)	Deal No.	Accrued Interest (\$)	Coupon Frequency	Reference
30-Sep-24	5,000,000.00	5.37%	Westpac Group	AA-	30-Oct-23	5,023,539.73	544600	23,539.73	At Maturity	3718
9-Oct-24	10,000,000.00	5.34%	Suncorp Bank	A+	22-Nov-23	10,013,167.12	544654	13,167.12	At Maturity	3723
16-Oct-24	5,000,000.00	5.47%	Suncorp Bank	A+	28-Nov-23	5,002,247.95	544670	2,247.95	At Maturity	3724
24-Oct-24	5,000,000.00	5.35%	ING Bank (Australia)	A*	24-Oct-23	5,027,849.32	544588	27,849.32	At Maturity	3716
30-Oct-24	5,000,000.00	5.40%	Westpac Group	AA-	27-Oct-23	5,025,890.41	544599	25,890.41	Quarterly	3717
8-Nov-24	2,000,000.00	5.48%	Suncorp Bank	A+	7-Nov-23	2,007,206.58	544624	7,206.58	At Maturity	3720
8-Nov-24	5,000,000.00	5.48%	Suncorp Bank	A+	7-Nov-23	5,018,016.44	544621	18,016.44	At Maturity	3719
24-Feb-25	500,000.00	0.80%	Westpac Group	AA-	24-Feb-21	500,076.71	540967	76.71	Quarterly	3481
	296,200,000.00					301,960,487.68		5,760,487.68		



**Investment Summary Report
December 2023**

Camden Council

Executive Summary - December 2023



Investment Holdings

	Amount (\$)	Current Yield (%)
Cash	17,450,000	4.35
Term Deposit	289,700,000	5.16
Total	307,150,000	

Sources of Funds

	Amount (\$)
Section 7.11 Developer Contributions	178,643,202
Restricted Grant Income	64,866,865
Externally Restricted Reserves	15,755,809
Internally Restricted Reserves	29,617,436
General Fund	18,266,688
Total Funds Invested	307,150,000

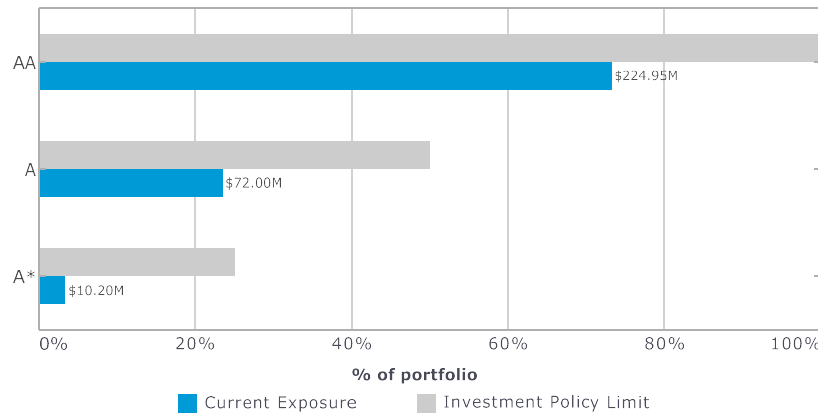
Term to Maturity

	Amount (\$)		Policy Max
Between 0 and 1 years	306,650,000	100%	100% ✓
Between 1 and 3 years	500,000	0%	60% ✓
Total	307,150,000		

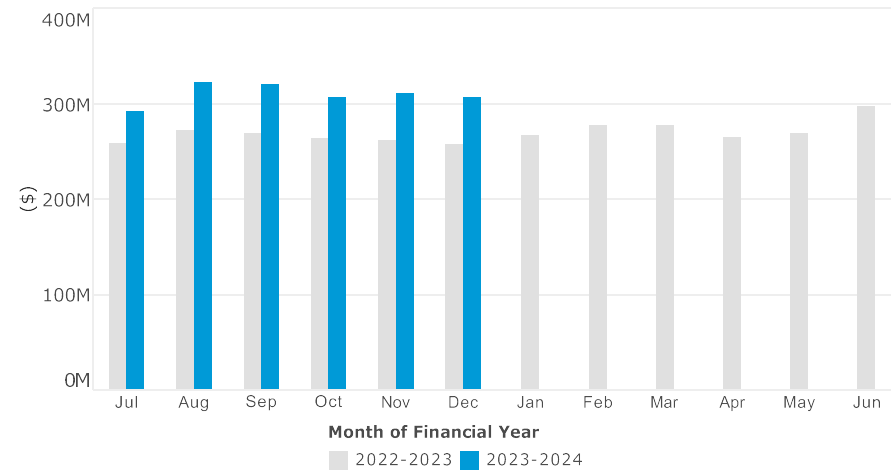
Council's investment portfolio has decreased by \$3.55M since the November reporting period. The decrease primarily relates to capital and operating expenditure during the month.

Percentages in this report may not add up to 100% due to rounding.

Total Credit Exposure



Investment Portfolio Balance



*Council's investment policy limits investments in foreign subsidiary banks which are monitored by APRA to a maximum 25% of the total portfolio





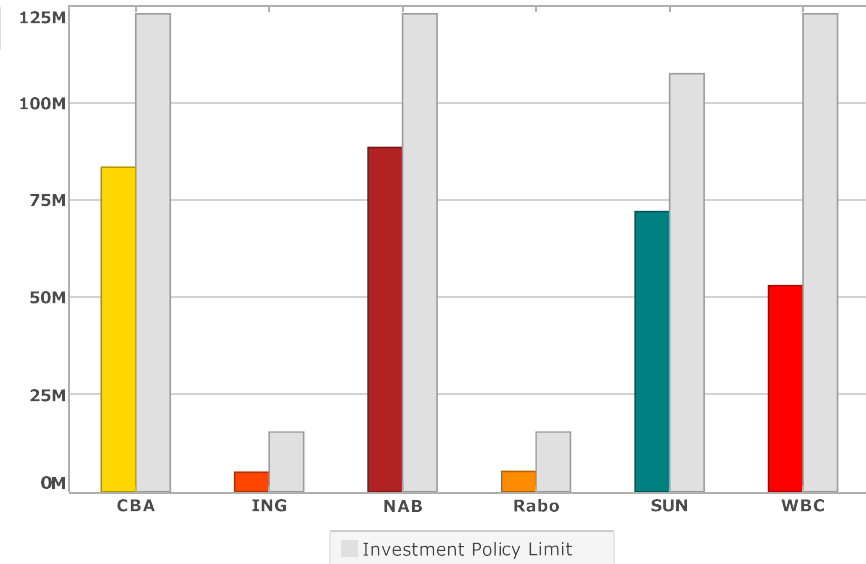
Camden Council

Individual Institutional Exposures Report - December 2023

Individual Institutional Exposures

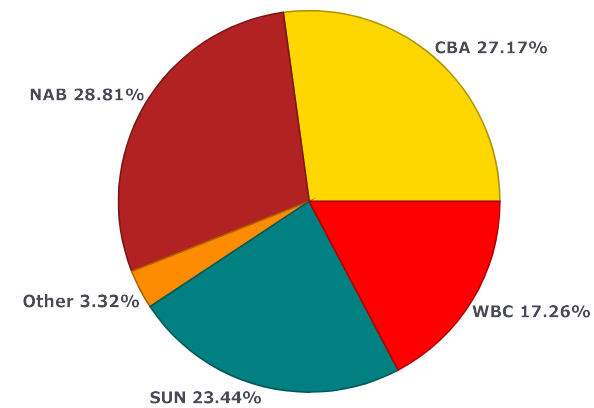
	Current Exposures		Policy Limit		Capacity
Commonwealth Bank of Australia (AA-)	83.45M	27.17%	122.86M	40.00%	39.41M
ING Bank Australia [Foreign Sub] (A*)	5.00M	1.63%	15.36M	5.00%	10.36M
National Australia Bank (AA-)	88.50M	28.81%	122.86M	40.00%	34.36M
Rabobank Aus [Foreign Sub] (A+*)	5.20M	1.69%	15.36M	5.00%	10.16M
Suncorp Bank (A+)	72.00M	23.44%	107.50M	35.00%	35.50M
Westpac Group (AA-)	53.00M	17.26%	122.86M	40.00%	69.86M
	307.15M				

Individual Institutional Exposure Charts



*Council's investment policy limits investments in foreign subsidiary banks which are monitored by APRA to a maximum 5% of the total portfolio in any single entity

Council's portfolio is within its individual institutional investment policy limits.
 Council's portfolio is within its term to maturity investment policy limits.
 Council's portfolio complies with the NSW Ministerial Investment Order.



Camden Council

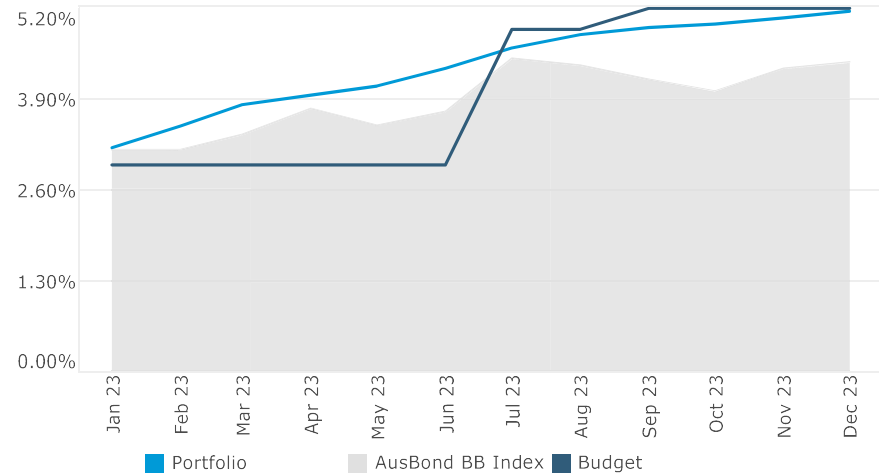
Performance Summary - December 2023



Interest Summary

Interest Summary as of December 2023	
Number of Investments	58
Average Days to Maturity	163
Weighted Portfolio Yield	5.16%
CBA Call Account	4.35%
Highest Rate	5.56%
Lowest Rate	0.80%
Budget Rate	5.20%
Average BBSW (30 Day)	4.30%
Average BBSW (90 Day)	4.36%
Average BBSW (180 Day)	4.49%
Official Cash Rate	4.35%
AusBond Bank Bill Index	4.43%

Investment Performance



Interest Received During the 2023/2024 Financial Year				
	December	Cumulative	Original Budget	Revised Budget
General Fund	\$266,515	\$1,807,459	\$1,839,000	\$2,422,000
Restricted	\$1,042,451	\$5,772,759	\$8,285,000	\$10,220,000
Total	\$1,308,966	\$7,580,218	\$10,124,000	\$12,642,000

Historical Performance Summary (%pa)			
	Portfolio	AusBond BB Index	Outperformance
Dec 2023	5.16%	4.43%	0.73%
Last 3 months	5.07%	4.26%	0.81%
Last 6 months	4.93%	4.31%	0.62%
Financial Year to Date	4.93%	4.31%	0.62%
Last 12 months	4.38%	3.89%	0.49%

Investment Performance

Council's portfolio returned 5.16%pa on a weighted average yield basis during December. This compares favourably with the Ausbond Bank Bill Index's return of 4.43%pa for the month.





Camden Council

Investment Holdings Report - December 2023

Cash Accounts

Amount (\$)	Current Yield (%)	Institution	Credit Rating	Current Value (\$)	Deal No.	Reference
17,450,000.00	4.35%	Commonwealth Bank of Australia	AA-	17,450,000.00	535548	
17,450,000.00				17,450,000.00		

Term Deposits

Maturity Date	Amount (\$)	Rate	Institution	Credit Rating	Purchase Date	Amount plus Accrued Int (\$)	Deal No.	Accrued Interest (\$)	Coupon Frequency	Reference
3-Jan-24	2,000,000.00	3.40%	Rabobank Australia	A+*	4-Jan-19	2,067,441.10	537443	67,441.10	Annually	3173
8-Jan-24	5,000,000.00	4.82%	Commonwealth Bank of Australia	AA-	4-Jan-23	5,120,826.53	543680	120,826.53	SemiAnnually	3663
15-Jan-24	5,000,000.00	4.80%	Commonwealth Bank of Australia	AA-	10-Jan-23	5,120,325.17	543692	120,325.17	SemiAnnually	3664
24-Jan-24	5,000,000.00	4.98%	National Australia Bank	AA-	21-Feb-23	5,214,208.22	543848	214,208.22	At Maturity	3670
31-Jan-24	5,000,000.00	5.00%	National Australia Bank	AA-	21-Feb-23	5,215,068.49	543849	215,068.49	At Maturity	3671
7-Feb-24	6,000,000.00	4.83%	Commonwealth Bank of Australia	AA-	8-Feb-23	6,259,629.04	543800	259,629.04	At Maturity	3669
14-Feb-24	5,000,000.00	5.02%	National Australia Bank	AA-	21-Feb-23	5,215,928.77	543850	215,928.77	At Maturity	3672
21-Feb-24	5,000,000.00	5.00%	National Australia Bank	AA-	28-Feb-23	5,210,273.97	543871	210,273.97	At Maturity	3673
28-Feb-24	1,000,000.00	3.20%	Rabobank Australia	A+*	28-Feb-19	1,026,915.07	537586	26,915.07	Annually	3189
28-Feb-24	6,000,000.00	5.00%	National Australia Bank	AA-	2-Mar-23	6,250,684.93	543885	250,684.93	At Maturity	3674
4-Mar-24	1,200,000.00	3.20%	Rabobank Australia	A+*	4-Mar-19	1,231,666.85	537601	31,666.85	Annually	3192
6-Mar-24	5,000,000.00	5.44%	Westpac Group	AA-	19-Jul-23	5,123,704.11	544324	123,704.11	At Maturity	3698
11-Mar-24	5,000,000.00	4.91%	Westpac Group	AA-	8-Mar-23	5,201,108.22	543914	201,108.22	At Maturity	3675
18-Mar-24	5,000,000.00	4.52%	National Australia Bank	AA-	17-Apr-23	5,160,367.12	544023	160,367.12	At Maturity	3677
20-Mar-24	5,000,000.00	5.13%	Suncorp Bank	A+	28-Nov-23	5,023,893.15	544671	23,893.15	At Maturity	3725
27-Mar-24	1,000,000.00	3.00%	Rabobank Australia	A+*	29-Mar-19	1,022,849.32	537765	22,849.32	Annually	3200
27-Mar-24	5,000,000.00	5.34%	National Australia Bank	AA-	1-Aug-23	5,111,920.55	544345	111,920.55	At Maturity	3700
3-Apr-24	5,000,000.00	4.60%	Westpac Group	AA-	31-Mar-23	5,173,917.81	543975	173,917.81	At Maturity	3676
8-Apr-24	5,000,000.00	4.62%	Westpac Group	AA-	1-May-23	5,155,054.79	544054	155,054.79	At Maturity	3678
15-Apr-24	5,000,000.00	4.62%	Westpac Group	AA-	1-May-23	5,155,054.79	544055	155,054.79	At Maturity	3679
24-Apr-24	5,000,000.00	5.02%	Commonwealth Bank of Australia	AA-	29-May-23	5,149,224.66	544132	149,224.66	At Maturity	3681
1-May-24	5,000,000.00	5.15%	Commonwealth Bank of Australia	AA-	5-Jun-23	5,148,150.68	544159	148,150.68	At Maturity	3685
8-May-24	5,000,000.00	5.56%	National Australia Bank	AA-	3-Jul-23	5,138,619.18	544283	138,619.18	At Maturity	3693



Camden Council Investment Holdings Report - December 2023

Maturity Date	Amount (\$)	Rate	Institution	Credit Rating	Purchase Date	Amount plus Accrued Int (\$)	Deal No.	Accrued Interest (\$)	Coupon Frequency	Reference
8-May-24	5,000,000.00	5.56%	National Australia Bank	AA-	7-Jul-23	5,135,572.60	544301	135,572.60	At Maturity	3694
13-May-24	5,000,000.00	5.12%	Suncorp Bank	A+	9-Oct-23	5,058,915.07	544568	58,915.07	At Maturity	3715
15-May-24	5,000,000.00	5.56%	National Australia Bank	AA-	7-Jul-23	5,135,572.60	544302	135,572.60	At Maturity	3695
22-May-24	5,000,000.00	5.50%	Suncorp Bank	A+	13-Jul-23	5,129,589.04	544317	129,589.04	At Maturity	3696
29-May-24	5,000,000.00	5.50%	National Australia Bank	AA-	26-Jun-23	5,142,397.26	544226	142,397.26	At Maturity	3690
29-May-24	7,500,000.00	5.40%	National Australia Bank	AA-	1-Aug-23	7,669,767.12	544346	169,767.12	At Maturity	3701
5-Jun-24	10,000,000.00	5.07%	Commonwealth Bank of Australia	AA-	1-Jun-23	10,297,254.79	544143	297,254.79	At Maturity	3682
12-Jun-24	5,000,000.00	5.50%	National Australia Bank	AA-	26-Jun-23	5,142,397.26	544227	142,397.26	At Maturity	3691
19-Jun-24	5,000,000.00	5.37%	Suncorp Bank	A+	30-Nov-23	5,023,539.73	544681	23,539.73	At Maturity	3726
19-Jun-24	5,000,000.00	5.50%	Commonwealth Bank of Australia	AA-	27-Jun-23	5,141,643.84	544228	141,643.84	At Maturity	3692
26-Jun-24	5,000,000.00	5.51%	National Australia Bank	AA-	24-Jul-23	5,121,521.92	544332	121,521.92	At Maturity	3699
3-Jul-24	5,000,000.00	5.54%	Commonwealth Bank of Australia	AA-	16-Aug-23	5,104,728.77	544399	104,728.77	At Maturity	3704
10-Jul-24	5,000,000.00	5.41%	Commonwealth Bank of Australia	AA-	29-Aug-23	5,092,636.99	544438	92,636.99	At Maturity	3708
17-Jul-24	5,000,000.00	5.26%	Suncorp Bank	A+	4-Dec-23	5,020,175.34	544686	20,175.34	At Maturity	3727
17-Jul-24	5,000,000.00	5.45%	Suncorp Bank	A+	17-Jul-23	5,125,424.66	544319	125,424.66	At Maturity	3697
24-Jul-24	5,000,000.00	5.45%	Suncorp Bank	A+	8-Nov-23	5,040,315.07	544626	40,315.07	At Maturity	3721
30-Jul-24	10,000,000.00	5.51%	Commonwealth Bank of Australia	AA-	21-Aug-23	10,200,775.34	544402	200,775.34	At Maturity	3705
7-Aug-24	5,000,000.00	5.37%	Suncorp Bank	A+	13-Nov-23	5,036,045.21	544636	36,045.21	At Maturity	3722
14-Aug-24	5,000,000.00	5.55%	Commonwealth Bank of Australia	AA-	8-Aug-23	5,110,244.90	544362	110,244.90	SemiAnnually	3702
21-Aug-24	7,500,000.00	5.23%	Westpac Group	AA-	14-Aug-23	7,551,583.56	544386	51,583.56	Quarterly	3703
28-Aug-24	5,000,000.00	5.20%	Suncorp Bank	A+	7-Dec-23	5,017,808.22	544706	17,808.22	At Maturity	3728
28-Aug-24	5,000,000.00	5.22%	National Australia Bank	AA-	23-Aug-23	5,093,673.97	544417	93,673.97	At Maturity	3706
4-Sep-24	5,000,000.00	5.21%	National Australia Bank	AA-	4-Sep-23	5,084,930.14	544456	84,930.14	At Maturity	3710
11-Sep-24	5,000,000.00	5.25%	National Australia Bank	AA-	11-Sep-23	5,080,547.95	544501	80,547.95	At Maturity	3711
18-Sep-24	5,000,000.00	5.16%	Westpac Group	AA-	18-Sep-23	5,009,895.89	544512	9,895.89	Quarterly	3713
23-Sep-24	5,000,000.00	5.27%	Westpac Group	AA-	25-Sep-23	5,070,747.95	544524	70,747.95	At Maturity	3714
30-Sep-24	5,000,000.00	5.37%	Westpac Group	AA-	30-Oct-23	5,046,343.84	544600	46,343.84	At Maturity	3718
9-Oct-24	10,000,000.00	5.34%	Suncorp Bank	A+	22-Nov-23	10,058,520.55	544654	58,520.55	At Maturity	3723
16-Oct-24	5,000,000.00	5.47%	Suncorp Bank	A+	28-Nov-23	5,025,476.71	544670	25,476.71	At Maturity	3724



Camden Council

Investment Holdings Report - December 2023

Maturity Date	Amount (\$)	Rate	Institution	Credit Rating	Purchase Date	Amount plus Accrued Int (\$)	Deal No.	Accrued Interest (\$)	Coupon Frequency	Reference
24-Oct-24	5,000,000.00	5.35%	ING Bank (Australia)	A*	24-Oct-23	5,050,568.49	544588	50,568.49	At Maturity	3716
30-Oct-24	5,000,000.00	5.40%	Westpac Group	AA-	27-Oct-23	5,048,821.92	544599	48,821.92	Quarterly	3717
8-Nov-24	2,000,000.00	5.48%	Suncorp Bank	A+	7-Nov-23	2,016,515.07	544624	16,515.07	At Maturity	3720
8-Nov-24	5,000,000.00	5.48%	Suncorp Bank	A+	7-Nov-23	5,041,287.67	544621	41,287.67	At Maturity	3719
13-Dec-24	5,000,000.00	5.30%	Suncorp Bank	A+	13-Dec-23	5,013,794.52	544718	13,794.52	At Maturity	3729
24-Feb-25	500,000.00	0.80%	Westpac Group	AA-	24-Feb-21	500,416.44	540967	416.44	Quarterly	3481
289,700,000.00						295,936,282.92		6,236,282.92		



camden
council

Xx February 2024

EDMS Ref: 24/xxxxx

Infrastructure Planning
Department of Planning, Housing and Environment
4 Parramatta Square,
12 Darcy Street,
Parramatta, NSW, 2150

To the Infrastructure Planning Team,

Camden Council submission to the updated Local Infrastructure Practice Notes

Camden Council (Council) welcomes the opportunity to provide a submission on the exhibited updates to the local infrastructure contributions practice notes.

Council welcomes the Department's review and update of these practice notes and is **generally in support** of the proposed changes, particularly the restructure of the modules, as they better guide users to relevant information.

Attached to this submission is the Department's feedback form with the Council's comments regarding each module.

Should you require any further information regarding this matter, please don't hesitate to contact Patricia Sim at patricia.sim@camden.nsw.gov.au.

Yours sincerely,

Milan Marecic
Director Growth and Finance



70 Central Ave,
Oran Park NSW 2570



mail@camden.nsw.gov.au



PO Box 183, Camden 2570



camden.nsw.gov.au



4654 7777



4654 7829



DX 25807



ABN: 31 117 341 764



camden
council

English

"This information is important. If you need help understanding this document please call the Translating and Interpreting Service (TIS) on 131 450 and ask them to contact Council on 02 4654-7777 on your behalf."

Arabic

٠٢ ٤٦٥٤ ٧٧٧٧ نيابة عنك هذه معلومات هامة. إذا كنت تحتاج إلى مساعدة في فهم هذا المستند برجاء الاتصال بخدمة الترجمة الشفهية والخطبة TIS على الرقم ١٣١ ٤٥٠ وأطلب منهم أن يتصلوا بالبلدية على الرقم

Croatian

Ove informacije su važne. Ako trebate pomoć da biste razumijeli ovaj dokument, molimo vas nazovite Službu prevoditelja i tumača (TIS) na 131 450 i zamolite ih da u vaše ime nazovu Općinu na 02 4654 7777.

German

Diese Informationen sind wichtig. Wenn Sie beim Verständnis dieses Dokuments Hilfe benötigen, wenden Sie sich bitte unter der Rufnummer 131 450 an den *Translating and Interpreting Service* (Übersetzer- und Dolmetscherdienst) und bitten Sie diesen Dienst, sich in Ihrem Namen unter 02 4654-7777 an die Kommunalverwaltung zu wenden.

Greek

Αυτές οι πληροφορίες είναι σημαντικές. Εάν χρειάζεστε βοήθεια για να καταλάβετε αυτό το έντυπο παρακαλώ τηλεφωνείτε στην Υπηρεσία Μεταφραστών και Διαρμηνέων (TIS) στο 131 450 και ζητήστε τους να επικοινωνήσουν με το Δημοτικό Συμβούλιο εκ μέρους σας στο 02 4654 7777.

Italian

Queste informazioni sono importanti. Se vi serve aiuto per comprendere questo documento, chiamate il servizio traduzioni e interpreti (TIS) al numero 131 450 chiedendo che contatti il Comune per vostro conto al numero 02 4654-7777.

Maltese

Din l-informazzjoni hija importanti. Jekk ikollok b'żonn għajnuna biex tifhem dan id-dokument jekk jogħġbok ċempel il-Translating and Interpreting Service (TIS) (Servizz ta' Traduzzjoni u Interpreter) fuq 131 450 u itlobhom biex jikkuntattjaw lill-Kunsill fuq 02 4654 7777 f'ismek.

Serbian

Ove informacije su važne. Ako vam treba pomoć da biste razumeli ovaj dokument, molimo vas da nazovete Službu prevodilaца и тумача (TIS) на 131 450 и замолите их да у ваше име назову Општину на 02 4654 7777.

Spanish

Esta información es importante. Si necesita ayuda para entender este documento sírvase llamar al Servicio de Traducción e Interpretación (Translating and Interpreting Service / TIS) al 131 450 y pídale que se comuniquen por usted con el Municipio llamando al 02 4654-7777.

Tagalog

Ang impormasyong ito ay mahalaga. Kung kailangan mo ng tulong upang maintindihan ang dokumentong ito mangyari lamang na tawagan ang Serbisyo para sa Pagsasaling-wika at Pang-interpreter (TIS) sa 131 450 at hilingin sa kanila na kontakin para sa inyo ang Konseho sa 02 4654 7777.

Chinese

這是一份重要的資料。如果您在了解這份文件方面需要幫助，請致電 131 450 聯絡翻譯及傳譯服務 (TIS)，然後要求代致電 02 4654 7777 聯絡市議會。



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Department of Planning and Environment

Changes to the practice notes

The Department of Planning and Environment has undertaken the first comprehensive rewrite of all local infrastructure contributions practice notes since 2005.

The practice notes are now expressed in plain language and provided in a consistent format to make them easier to navigate. Updates have been made to the content clarifying policy, providing additional best practice guidance and new worked examples. We have not made changes to current policy.

We have released these practice notes as draft and want to hear from practitioners and other interested stakeholders before finalising. We are also eager to hear how we can build this resource over time.

The consultation burden on councils is high and this is a significant amount of content.

We have made this feedback form to make it easy for stakeholders to provide feedback. You can also contact us at infrastructure.contributions@planning.nsw.gov.au to ask questions or to arrange a briefing session.

What feedback are we seeking?

We are seeking feedback to help develop the practice notes into a practical hands on tool for local contributions practitioners. The feedback you provide will be used to identify:

- where the draft practice notes could be clarified or amended to better explain concepts;
- gaps in the guidance and other topics to be covered in future releases;
- resources that stakeholders would find useful (for example different types of templates); and
- areas where the department could collaborate with stakeholders to develop knowledge-sharing materials like worked examples.

How will we use your feedback?

The feedback will be used to make immediate improvements to the initial set of practice notes prior to their release. We will also use this feedback to establish a program of future work including opportunities to collaboratively develop materials with those who have the capacity to do so.

Feedback form



Feedback form

Provide your feedback on the new draft local infrastructure contributions practice notes. Submissions due by Friday 23 February 2024. Once complete, submit this form on the [NSW Planning Portal](#).

Name: Ben Richards

Council or organisation: Camden Council

Email: Benjamin.richards@camden.nsw.gov.au

Phone: 0428 432 660

How to fill in this feedback form:

- *There is a page for each module to help you to provide your comments.*
- *Use the Navigation Pane under the 'View' toolbar to jump between pages of this document.*
- *You don't have to respond to each module or every question.*
- *You are welcome to include any other attachments or comments in your final submission on the Planning Portal.*

Feedback form



1. Role and structure of the practice notes

Link: <https://www.planningportal.nsw.gov.au/role-and-structure-of-practice-notes>

What's changed

The new practice notes are broken into chapters which are called modules, and each module is on a specific policy topic. They are designed so someone can read a practice note front to back or go directly to a policy topic, depending on their requirements. This module describes the new structure.

The new format provides a clear distinction between policy positions, best practice advice and procedure.

Are there gaps in this module? Could any concepts be more clearly explained?

Nothing to add, the explanations, especially around structuring each module into 6 consistent sections really helps with legibility.

Are there any resources, templates or materials that would help?

An easy to access PDF or printable version would be helpful. More comments regarding formatting is further explained in the next box.

Is the new format clear?

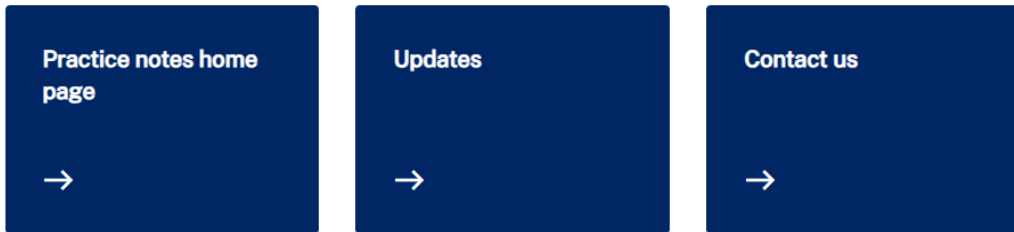
Yes, but some recommendations below to improve navigation.

1. This guide provided in the practice notes is really helpful ([Supporting+material+-+structure+of+the+new+practice+notes.png \(3253x4292\) \(amazonaws.com\)](#)) however it's only available via the exhibition page. This could be integrated into the modules via a sidebar so that:
 - a. It is in a format where one could simply use ctrl+f to find key words on the page.
 - b. It acts like a site map and clicking on a tile brings the user straight to the highlighted page.
2. There is no way to navigate to the previous / next page, home page (of the Practice Notes, not the Planning Portal), or any other page. Again, this may be resolved with a sidebar.

Feedback form



- 3. Camden Council’s DCP ([Residential Subdivision » Camden Council Development Control Plan \(nsw.gov.au\)](#)) pages isn’t a perfect example but some noteworthy bits are:
 - a. It has a sidebar that lands onto expandable sub-sections
 - b. There is an easy way to go back to the homepage of the DCP
 - c. Navigation to the next / previous page
 - d. Pages can be made a favourite
 - e. There is a shortcut to download the document. This one is set up per module which is alright, but it’s missing the download of the whole document. [Download DCP 2019 » Camden Council Development Control Plan \(nsw.gov.au\)](#)
- 4. Under each module, the buttons below could instead lead to relevant pages. (For example, under “selecting the most appropriate contribution mechanism”, the buttons could lead to “preparing a S7.11, S7.12 and Planning Agreements”



- 5. This feedback form is good in that it identifies the sections / pages that are part of the exhibition / practice notes, but the actual practice notes (within individual modules) don’t do that.

Feedback form



2. Principles of infrastructure contributions

Link: <https://www.planningportal.nsw.gov.au/principles-of-infrastructure-contributions>

What's changed

Reasonableness, nexus, apportionment, and accountability remain the underlying principles of the local infrastructure contribution system. The guidance on how these principles can be considered specifically for each local contribution mechanisms has been expanded and made clearer.

Are there gaps in this module? Could any concepts be more clearly explained?

Are there any resources, templates or materials that would help?

Feedback form



3. Selecting the most appropriate contribution mechanism

Link: <https://www.planningportal.nsw.gov.au/selecting-most-appropriate-contribution-mechanism>

What's changed

Guidance has been reworded in plain language and simplified.

A detailed comparison between the different mechanisms has been added, including consideration on which may be appropriate for different circumstances.

Are there gaps in this module? Could any concepts be more clearly explained?

Are there any resources, templates or materials that would help?

Feedback form



4. Ministerial directions for local contributions

Link: <https://www.planningportal.nsw.gov.au/ministerial-directions-local-contributions>

What's changed

All the existing Ministerial directions for local contributions have been consolidated into this module. A summary of the Minister's existing direction making powers for local contributions has been added.

Are there gaps in this module? Could any concepts be more clearly explained?

For the active ministerial directions setting the maximum monetary contribution payable under section 7.11 plans, can the descriptions be more specific than "further amendment to the EP and A Direction 2012"? Some of the rows do identify specific points.

Clarify whether ministerial directions are meant to have no expiration date unless specified. Also, include expiration dates / triggers (if any).

Are there any resources, templates or materials that would help?

Feedback form



5. What can be funded through section 7.11 and 7.12 contributions

Link: <https://www.planningportal.nsw.gov.au/funding-through-section-711-712-contributions>

What's changed

Guidance has been reworded in plain language and simplified. Discussion of the constraints of each mechanism has been expanded.

Are there gaps in this module? Could any concepts be more clearly explained?

Would this module be better placed directly after "selecting the most appropriate contribution mechanism"? This seems like a continuation of why a Council might select one mechanism over another. Suggestion: maybe move Ministerial Directions to module 3 and then have "selecting the most appropriate" and "what can be funded" right after each other.

Are there any resources, templates or materials that would help?

Council maintains that the construction of new community facilities are an essential works item, especially in growth areas where there are no existing community facilities.

Additionally, is there any guidance on funding capital infrastructure relating to sustainability and circular economy? As Council and State government priorities shift to sustainability, would the funding of say electric vehicle chargers or better material recovery facilities be possible? This is likely more suited to S7.12 than S7.11 but an argument for nexus could be made in that the demand for electric vehicle charging and waste management facilities increase with population.

Feedback form



6. Governance, probity, and internal controls

Link: <https://www.planningportal.nsw.gov.au/governance-probity-internal-controls>

What's changed

Guidance around governance and probity for local contributions has been expanded, including more detail on how councils can ensure appropriate measures are taken.

Are there gaps in this module? Could any concepts be more clearly explained?

Are there any resources, templates or materials that would help?

Some template clauses / conditions to be included in a CP / VPA regarding governance and probity could be provided.

Feedback form



7. Joint contributions plans and cross boundary infrastructure

Link: <https://www.planningportal.nsw.gov.au/joint-contributions-plans-cross-boundary-infrastructure>

What's changed

Existing guidance for development sites that extend across LGA boundaries has been simplified.

Are there gaps in this module? Could any concepts be more clearly explained?

Joint contribution plans are complex to administer. Is there any guidance around Councils instead doing funding agreements? Say, each Council having its own contribution plans, but agreeing the apportionment on regional infrastructure and then the contributions collected to be "distributed" at a specified period.

Are there any resources, templates or materials that would help?

[Empty text box for resources, templates or materials]

Feedback form



8. Making a section 7.11 contributions plan

Link: <https://www.planningportal.nsw.gov.au/making-section-711-contributions-plan>

What's changed

Guidance has been reworded in plain language and expanded, including new guidance on the contents of a contributions plan and the steps required to develop one.

Are there gaps in this module? Could any concepts be more clearly explained?

No, but the links under content of a section 7.11 plan and procedure and process are very valuable, good to have links to both the Regs and other modules of the practice notes.

Are there any resources, templates or materials that would help?

Feedback form



9. Exempting certain development from contributions

Link: <https://www.planningportal.nsw.gov.au/exempting-certain-development-from-contributions>

What's changed

Guidance has been reworded in plain language and simplified.

Are there gaps in this module? Could any concepts be more clearly explained?

Where certain Crown development is exempt from contributions, how is Council expected to make up for this shortfall? For example, where a school is built, how is the increased demand for road and transport infrastructure covered? Two scenarios below:

1. The Crown development is expected to do "works in kind" to support their development.
2. Council's must assume in development assumptions that Crown sites do not pay a contribution so the rest of the catchment should pay for the Crown development's share of contributions.

This question is similar for other exempted developments such as affordable housing, seniors housing, etc.

Are there any resources, templates or materials that would help?

Regarding providing a discount, could there be some guidance on what / how developments would qualify for a discount? For example, an aged care community that provides on-site drainage and recreational facilities does not "increase demand" and may not be required to pay contributions, at least to those infrastructure categories.

Feedback form



10. Defining plan catchments and subcatchments

Link: <https://www.planningportal.nsw.gov.au/defining-plan-catchments-subcatchments>

What's changed

Existing guidance on catchment boundaries and mapping in contributions plans has been expanded, including recommending that contribution plan maps be to the same standard as other maps created by council.

Are there gaps in this module? Could any concepts be more clearly explained?

Are there any resources, templates or materials that would help?

Feedback form



11. Determining demand and demonstrating nexus

Link: <https://www.planningportal.nsw.gov.au/determining-demand-demonstrating-nexus>

What's changed

Guidance has been reworded in plain language and simplified. New guidance on different ways councils can demonstrate nexus depending on the type and scale of infrastructure has been added.

Are there gaps in this module? Could any concepts be more clearly explained?

Are there any resources, templates or materials that would help?

Will IPART also be drafting guidance? It might be useful to put links to their benchmark cots (if they are using those to analyse contribution plans) and any other criteria they may have when checking if CPs demonstrate nexus and apportionment.

It might be useful to include a link to the checklist IPART use when reviewing CPs.

Feedback form



12. Developing a works schedule and mapping infrastructure

Link: <https://www.planningportal.nsw.gov.au/developing-works-schedule-mapping-infrastructure>

What's changed

Existing guidance on developing works schedules has been expanded, including new guidance detailing how works schedules should feed into a council's financial plan and delivery program and expanded guidance on mapping requirements. A new works scheduled template has been provided including suggested contents.

Are there gaps in this module? Could any concepts be more clearly explained?

Please include guidance around other considerations when costing, for example:

Land acquisition

- Hardship costs (The Valuer General's valuation does not take land contamination into consideration, leaving Council [and as a result, residents] having to fund the cost of remediating the land)
- Valuer General costs (and what the VG's published value is based on)
- Market value, especially areas where acquisition via purchase (rather than dedication) is more likely

Works

- On-costs (project management, LSL)
- Contingencies

Actual cost recoupment

- Additional land rehabilitation (e.g. where there is contamination)
- Other possible unforeseen costs that can be included for recoupment

Are there any resources, templates or materials that would help?

Feedback form



Feedback form



13. Estimating infrastructure costs

Link: <https://www.planningportal.nsw.gov.au/estimating-infrastructure-costs>

What's changed

Guidance outlining that councils can use cost estimates, benchmarks and actual costs in their plans has been expanded, including discussion around the when each may be appropriate to use in a contributions plan.

Guidance on nominal cost versus net present value has been expanded, explaining the benefits and draw backs of each methodology and providing a worked example.

Are there gaps in this module? Could any concepts be more clearly explained?

1. Where actual costs have been added in or current estimates for specific works are provided when the CP is reviewed and updated, will the CP need to be re-presented to IPART in order to charge the adjusted contribution rate? Would IPART consider a "fast-tracked" application that only looks at the modified portions of the works schedule?
2. It is likely that infrastructure will be delivered different to the assumed date of delivery and population could escalate at a different rate (a lot of assumptions could be challenged and change) - What happens to the NPV model then?

Are there any resources, templates or materials that would help?

1. The example provided showing nominal vs NPV could be best suited to an Excel file so that viewers can play around with assumptions and really understand the equations used.
2. How do Councils figure out an appropriate escalation rate to estimate future infrastructure or discount rate for future cashflows?
3. Also, clarify how the escalation and discount rates work vis a vis CPI and LVI already being used by Councils

Feedback form



14. Calculating contribution rates

Link: <https://www.planningportal.nsw.gov.au/calculating-contributions-rates>

What's changed

Guidance has been reworded in plain language and simplified.

Are there gaps in this module? Could any concepts be more clearly explained?

Are there any resources, templates or materials that would help?

For which infrastructure types / development types would different methods of calculating a contribution work best? For example, where is it appropriate to have a per visitor or tourist contribution and how do you apportion that between commercial and residential. Also, a per person / per lot rate for open space vs a per NDA or per GFA for drainage infrastructure.

Feedback form



15. Exhibiting and adopting contributions plans

Link: <https://www.planningportal.nsw.gov.au/exhibiting-contributions-plans>

What's changed

Guidance has been reworded in plain language and simplified.

Are there gaps in this module? Could any concepts be more clearly explained?

Are there any resources, templates or materials that would help?

Feedback form



16. IPART review of section 7.11 plans

Link: <https://www.planningportal.nsw.gov.au/review-of-section-711-plans-ipart>

What's changed

Existing guidance has been simplified and superseded information has been removed.

No change has been made to the criteria IPART use to review contributions plans.

Are there gaps in this module? Could any concepts be more clearly explained?

1. Council reiterates the need for more than base-level open space embellishment and community facilities – these are essential to growth areas with no existing recreation facilities.
2. Still on the topic of base level embellishment – sometimes Council will have limited land to acquire for open space – can councils provide more innovative / dense / high quality recreation facilities outside of “base level embellishment” to meet population demand? The total value of the facility would reflect a reduced land acquisition cost while being able to provide higher quality embellishment.

Are there any resources, templates or materials that would help?

Feedback form



17. Reviewing, amending and repealing contributions plans

Link: <https://www.planningportal.nsw.gov.au/adopting-reviewing-repealing-contributions-plans>

What's changed

Guidance on plan reviews and benefits of a 4 or 5 year review timeframe has been expanded.

Many contributions plans are not reviewed within the suggested 5 year period, what barriers do councils face in undertaking regular plan review?

Camden Council is looking to review its CPs every 3 years. The latest review saw a restructure of its contributions portfolio and retirement of several older CPs. This project required Council to hire external consultants to update works schedules and population projections as well as coordinating with Finance and Assets to understand the long term financial plan, capital works program and rebalancing of cash contributions collected.

There is also the process of reporting to the contributions management committee, Council's executive leadership and then elected Council even prior to public exhibition. So, a review of CPs does require a lot of work, especially for teams that are under-resourced (some councils do not have a contributions planner, rather, a strategic or statutory planner delegated to oversee CPs).

Are there gaps in this module? Could any concepts be more clearly explained?

Can the costs of reviewing a contributions plan be included in a CP after review as "actual costs"? This would give Councils with small / under-resourced contribution teams the opportunity to hire an external consultant or fund a temporary position to oversee review.

Are there any resources, templates or materials that would help?

Feedback form



18. Indexing contribution rates and conditions of consent

Link: <https://www.planningportal.nsw.gov.au/indexing-contribution-rates-conditions-of-consent>

What's changed

Existing advice on indexation has been expanded including new advice discussing alternative indices, including Producer Price Index, which councils may wish to consider.

Are there gaps in this module? Could any concepts be more clearly explained?

Are there any resources, templates or materials that would help?

The Western Sydney Planning Partnership (WSPP) prepared a paper on which indices are best used for various contexts / classes of infrastructure. It would be good to include this here as guidance.

Feedback form



19. Works in kind agreements

Link: <https://www.planningportal.nsw.gov.au/works-in-kind-agreements>

What's changed

Guidance has been reworded in plain language and simplified. New guidance has been added highlighting the potential tendering obligations for works in kind and discussing the value of offsetting the works in kind agreements against the developer's total liability instead of just the one infrastructure category.

Are there barriers to entering into a works in kind agreements?

In Camden's case, Council is generally happy for WIKAs to happen because of development efficiencies and because it allows infrastructure to be delivered alongside development.

One issue is where a partial WIKA is proposed. For example, a WIKA to deliver a 300m half road of a 3km collector road. The portion provided by the WIKA will need to be redone when the whole road is completed.

With land dedication, sometimes the land is dedicated in a poor / contaminated state. Council has little control and cannot collect contributions for rehabilitation of land.

Are there gaps in this module? Could any concepts be more clearly explained?

It is not immediately clear that WIKAs are only for works in a contributions plan. This leads to confusion between WIKAs and VPAs.

It should also be clarified that the land on which WIKA works are located are not to be dedicated via a WIKA. It would be very helpful to provide another module with comprehensive guidance around how Council acquires infrastructure land, whether that is via land dedication in a Consent, purchased by Council via a contract of sale, compulsorily acquired or through a Planning Agreement.

Are there any resources, templates or materials that would help?

Some suggestions for Council in terms of what clauses / conditions should be included in WIKAs.

Feedback form



20. Credits for existing development or past contributions

Link: <https://www.planningportal.nsw.gov.au/credits-for-existing-development-or-past-contributions>

What's changed

Guidance has been reworded in plain language and simplified.

Are there gaps in this module? Could any concepts be more clearly explained?

The text here is mostly conceptual. This section could provide some examples. Some possible scenarios proposed below:

- Where a site paid contributions under a previous contributions plan and a new contribution plan is in place
- Where a site paid S7.11 contributions for say, subdivision but there is an LGA-wide S7.12 plan that charges for knockdown-rebuilds / alterations and additions
- Where a site paid S7.12 contributions in the past and then is proposing new development (e.g. massive renovation of a retail centre)
- Where a site was under a VPA which covered lot subdivision, but one of the final lots wants to build a secondary dwelling

Are there any resources, templates or materials that would help?

Feedback form



21. Timing of contributions payments

Link: <https://www.planningportal.nsw.gov.au/timing-contributions-payments>

What's changed

Guidance has been reworded in plain language and simplified, and some common payment timings have been included.

Are there gaps in this module? Could any concepts be more clearly explained?

Are there any resources, templates or materials that would help?

There was a COVID ministerial direction before regarding the delay of payment from CC to OC. Can this, as well as their expiration / effectivity dates, please be included here as references because some applicants still think it is in effect.

Feedback form



22. Making a section 7.12 contributions plan

Link: <https://www.planningportal.nsw.gov.au/making-section-712-contributions-plan>

What's changed

Guidance has been reworded in plain language and expanded, including new guidance on the contents of a contributions plan and the steps required to develop one.

Are there gaps in this module? Could any concepts be more clearly explained?

Are there any resources, templates or materials that would help?

Feedback form



23. Requesting a higher section 7.12 rate

Link: <https://www.planningportal.nsw.gov.au/requesting-higher-section-712-rate>

What's changed

Guidance has been reworded in plain language and simplified and the process for requesting the higher maximum percentage has been expanded, including that councils should contact the department before exhibiting a plan to discuss the higher percentage request.

No change has been made to the assessment criteria.

Are there gaps in this module? Could any concepts be more clearly explained?

The Department and Productivity Commission in the 2020 reform document published new minimum S7.12 rates that would be a \$/lot and \$/sqm of GFA rate and would have roughly equated to 3% of construction costs (for residential). This is considered a more reasonable minimum for S7.12 charges especially in established areas adjacent to growth areas where there will be demand on existing infrastructure from growth areas.

Are there any resources, templates or materials that would help?

A sample application for a S7.12 Plan with a higher contribution rate that shows what context / conditions the Department would approve for a higher S7.12 rate. Both a growth area and regional area would be highly beneficial.

Feedback form



24. Using planning agreements

Link: <https://www.planningportal.nsw.gov.au/using-planning-agreements>

What's changed

The planning agreement principles have been simplified to remove ones that were:

- legislative requirements,
- general planning requirements not specific to planning agreements,
- covered in detail elsewhere in the practice note.

The existing requirement for planning agreements to be assessed against the acceptability test has been made clearer.

Are there gaps in this module? Could any concepts be more clearly explained?

Are there any resources, templates or materials that would help?

There is sometimes confusion between how a WIKA and a VPA differ, not just in use but how Council can leverage each to deliver its infrastructure schedule. Can this section provide scenarios where each would be appropriate? I.e. a WIKA is only for works already listed in a contributions plan and only applies credits to the category of infrastructure provided whereas a VPA allows for "cross-bucketing" which improves the developer's cashflow / feasibility, but also allows councils to negotiate a better outcome for their community.

Feedback form



25. Council policies and procedures for planning agreements

Link: <https://www.planningportal.nsw.gov.au/council-policies-procedures-for-planning-agreement>

What's changed

Guidance has been reworded in plain language, simplified and duplication removed.

The requirements for council's planning agreement policies has been simplified and made clearer, including improved guidance around what procedures and processes councils should develop in their policies.

Are there gaps in this module? Could any concepts be more clearly explained?

Are there any resources, templates or materials that would help?

In the dropdown for what a Council's templates should include, could an actual planning agreement and explanatory note template be included? Noting that each Council will word their agreements differently, but it should set a consistent standard for what should be shown (e.g. standard clauses) in these documents.

Feedback form



26. Negotiating and entering into a planning agreement

Link: <https://www.planningportal.nsw.gov.au/negotiating-entering-into-a-planning-agreement>

What's changed

Guidance has been reworded in plain language, simplified and duplication removed. Indicative steps for entering into a planning agreement have been made clearer.

Are there gaps in this module? Could any concepts be more clearly explained?

Are there any resources, templates or materials that would help?

Feedback form



27. Notifying planning agreements

Link: <https://www.planningportal.nsw.gov.au/notifying-planning-agreements>

What's changed

Guidance on notifying planning agreements and writing explanatory notes has been expanded. New guidance has been added discussing the benefits of formally exhibiting planning agreements, instead of only notifying them.

Are there gaps in this module? Could any concepts be more clearly explained?

Are there any resources, templates or materials that would help?

Feedback form



28. Borrowing, pooling contributions and forward funding infrastructure

Link: <https://www.planningportal.nsw.gov.au/borrowing-forward-funding>

What's changed

Guidance has been reworded in plain language and simplified. The options for forward funding infrastructure, and the risks and benefits of doing so have been discussed in more detail. New guidance on councils' debt servicing ratios and the implications of borrowing have been added.

Are there barriers to forward funding infrastructure?

Yes, aside from councils typically taking a conservative approach with finance, there are already so many variables that go into the administration of a contributions plan. External borrowings cannot use future developer contribution income to secure funding so it has to be against rate income which in turn means another service can be funded from borrowings. There is also an issue with Treasury not lending in the event where councils could be seen to be competing with the development industry, which means they cant borrow to buy land locked or severed land to avoid paying compensation under Just Terms.

Are there gaps in this module? Could any concepts be more clearly explained?

On administering contributions in general, it might be helpful to indicate why a Council should consider having a contributions policy and what the policy would contain standards on. Items could include how WIKAs will be considered, security, exemptions, dealing with surplus credits, financial management (when will borrowing be considered and from which source), forward funding infrastructure and constrained lands (e.g. land that is constrained due to acquisition of land in a CP).

Are there any resources, templates or materials that would help?

Feedback form



29. Security for contributions and planning agreements

Link: <https://www.planningportal.nsw.gov.au/security-for-contributions-planning-agreements>

What's changed

Guidance has been reworded in plain language and simplified. Security is discussed in the context of both contributions plans and planning agreements, including expanded guidance on the different types of security, and which may be appropriate in different situations.

Are there gaps in this module? Could any concepts be more clearly explained?

Are there any resources, templates or materials that would help?

Feedback form



30. Financial management of contributions

Link: <https://www.planningportal.nsw.gov.au/financial-management-of-contributions>

What's changed

Guidance has been reworded in plain language and simplified.

Are there gaps in this module? Could any concepts be more clearly explained?

Already mentioned under the WIKA section, but the administering contributions practice note should provide guidance around how Council acquires infrastructure land, whether that is via land dedication in a Consent, purchased by Council via a contract of sale, compulsorily acquired or through a Planning Agreement. Land acquisition is one of the biggest and most uncertain costs for councils so the context, process and procedures around each of these acquisition methods would be very helpful.

Are there any resources, templates or materials that would help?

1. A cashflow model template may be of assistance. Last year, we conducted a restructure of Council's CP cashflow model and have been updating this internally. It took a lot of time to set up the cashflow model and to figure out the components and assumptions to be used.
2. A summary of grants available to local councils and the general requirements / conditions would be beneficial.

Feedback form



31. Reporting and publication requirements

Link: <https://www.planningportal.nsw.gov.au/reporting-publication-requirements>

What's changed

Guidance has been reworded in plain language and simplified. Information on the contributions reporting requirements introduced in 2020, and new optional templates have been added.

What are the barriers faced by councils when completing their reporting and publication requirements?

In the past, there was confusion and inconsistency around the format, so councils might have been tracking the wrong information. Given more standardised templates, proper procedures and software, reporting and publication has become more manageable.

Are there gaps in this module? Could any concepts be more clearly explained?

[Empty text box for feedback]

Are there any resources, templates or materials that would help?

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