

30 November 2015

Sunshine Coast Airport Expansion project - additional information to the Environmental Impact Statement

Summary of AEIS Submission by the Sunshine Coast Environment Council

Background

Issues from our EIS submission that do not appear to have been adequately addressed have been identified, as well as our comments on the AEIS responses and suggested solutions. New issues raised by the AEIS have also been added. These matters have formed the basis of our submission on the AEIS documents.

Our main concerns with regard to the EIS / AEIS documents are outlined below. The 'New Runway' option is the main subject of these documents. Very little information is provided for the 'Do Minimum' option.

Environment

As was outlined in the EIS, the project (ie 'New Runway') has the potential to have a number of environmental impacts. Some of these impacts can be avoided through appropriate management strategies (e.g. dredge impacts, salt water intrusion etc.) whereas others are likely to have a residual impact requiring offsets.

In relation to impacts that are proposed to be avoided through management strategies SCEC acknowledges that that the proposed management strategies are adequate but stress that it is imperative that these strategies are implemented and that their effectiveness be subject to ongoing monitoring and reporting.

Residual environmental impacts are described in Appendix B (Biodiversity Offsets Strategy) to the Additional Environmental Impact Statement (AEIS). The residual impacts are proposed to be offset through a number of initiatives described in Chapter 5 of the Biodiversity Offsets Strategy.

The commitments are welcomed but **it is SCEC's view that the on-site offset is inadequate in relation to the significance of the residual impacts.** There is potential to deliver a greater on-site offset, as well as the potential to enhance the biodiversity values of the site and surrounding area through a more appropriately designed offset.

Details of our concerns, as well as proposed solutions, have been outlined in our submission.

Value Engineering Exercise

The AEIS still has not provided any details / reports of the 'value engineering exercise' (VEE) carried out as part of the EIS. The VEE significantly reduced the extent of much of the previously proposed infrastructure (eg runway, terminal buildings, aprons, future business buildings) within the airport. Capacities of the reduced facilities still have not been provided, nor any explanation for size reductions (and still be able to provide until 2040). The economic benefits assessment is until 2040. Thus, all works needed until 2040 should also be identified, as well as the assessment of associated impacts.

The details of the Value Engineering Exercise should be provided **to confirm that capacities of the proposed infrastructure are adequate until 2040.** Any additional works to provide capacity until 2040 need to be

identified and costed for inclusion in the economic assessments, **as well as any associated environmental and social impacts.** [see Assumptions below for capacity of New Runway – exceeded by 2035]

Assumptions

The SCEC submission identified significant concerns about the accuracy / suitability of some of the assumptions and information in various consultant studies in the EIS. These primarily would affect the economic analysis, potentially reducing the BCR to about 1 for the “new Runway”. Such errors would also affect the Do Minimum option. The individual issues noted by SCEC have not been listed separately in the AEIS.

Some of the issues are:-

- The 'Do Minimum' Scenario indicates that a significant amount of aircraft movement will still occur within Australia and New Zealand, only 11% less than the 'New Runway'. Correspondingly, a significant amount of benefits will still accrue for this 'Do Minimum' Scenario. [Note: This is also relevant to any financial analysis for the airport – revenue will be related to aircraft movements. The incremental increase for the 'New Runway' above the 'Do Minimum' is unlikely to warrant the significant extra cost.]
- Capacity of (new) runway will be exceeded by about 2035, and perhaps other infrastructure before 2040.
- A B787-800 (design aircraft) can only take-off fully loaded from the SE end (for the 'New Runway'), the temperature is less than 15C and the aircraft has hi-thrust engines, otherwise load restrictions will apply (from Boeing design charts).

Social - Noise

The indication is that noise issues may have been done previously in the EIS, but are perhaps better shown now in Appendix L of the AEIS. Notwithstanding, there is still a different area affected adversely by the 'New Runway'. 'Do Minimum' and 'New Runway' have been compared with results favouring 'New Runway'. (Note: This has been only very briefly reviewed in the time available).

SCEC is currently not in a position to be able to comment on noise issues.

De-amalgamation

There should be public disclosure (other than AEIS) that Noosa Council area has been included in the assessment of economic benefits, thus, should also be a part of cost sharing arrangements.

Economic Assessment of 'Do Minimum' Option

The EIS did NOT include the details and results of economic assessments for the “Do Minimum” option to allow a proper comparison of the options. SCEC had requested for all details to be provided for the 'Do Minimum' option, but only the results have been provided in the AEIS.

The economic assessment results can now be summarised as follows:-

New Runway – NPV \$243m; BCR 2.45; Capital cost \$347m
Do Minimum – NPV \$297.6m; BCR 9.561; Capital cost \$70 to \$80m

The results, as provided in the EIS and AEIS documents, indicate that ‘Do Minimum’ is significantly better economically (NPV, BCR and capital cost) than the ‘New Runway’ option, even with increased access to destinations for the ‘New Runway’

The 'Do Minimum' is also intended to address CASA requirements for improved aircraft operation, but it is not clear as to how it addresses any current noise issues.

In view of the significant reduction in works for the Do Minimum option, it is likely that the extent of impact and risks associated with environmental issues will be much less. In the time and resources available, SCEC has only briefly reviewed this aspect.

The AEIS has deemed NO further action is necessary.

The 'Do Minimum' economic assessment details should be provided and made available for public comment. Notwithstanding, the economic assessment summary results are significantly in favour of 'Do Minimum'.

Summary

The limited information that has been provided in the EIS / AEIS for the 'Do Minimum' option indicates that it is a better option based on the economic assessment results. It also addresses operational issues, probably provides a better environmental outcome, but may not be as good for noise issues. Financial returns are also likely to be better for the 'Do Minimum'. Although airplane movements will be less, there is a greatly reduced expenditure.

SCEC also has concerns that the full extent of works prior to 2040 may not have been fully evaluated in the Value Engineering Exercise, and thus, the extent of environmental impacts has not been properly identified. SCEC has also noted that the Noosa Council area is specifically included in the assessment for benefits, and therefore should be included in any cost sharing arrangements.

SCEC has had limited time and resources to review the EIS and AEIS documents. There is also only very limited information available for the 'Do Minimum' option. Notwithstanding, the economic assessment results (as well as environmental aspects) give a strong indication that the project, based on the 'New Runway', should be re-evaluated, unless more information is made available to show otherwise.

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