

Development Watch Inc

PO Box 1076, Coolum Beach, QLD, 4573



ABN 53 627 632 278

www.developmentwatch.org.au

6 August 2019

The Master Plan Project Manager
Sunshine Coast Airport Pty Ltd
PO Box 9535
Pacific Paradise Qld 4564

Via email: masterplan2040@sunshinecoastairport.com.au

Dear Madam/Sir

Re: Sunshine Coast Airport Master Plan 2040

Development Watch Inc (DW) is a not-for-profit volunteer community organisation based in the Coolum district. Its primary aim is to advocate for urban development to be consistent with the current local government planning scheme and encourage sound policies and decision-making processes to promote development that enhances the long-term quality of life for the district.

From this perspective, DW is keenly interested in the development and ongoing management of the Sunshine Coast Airport and has studied the draft *Sunshine Coast Airport Master Plan 2040* (SCAMP) currently on public exhibition. Comments are attached.

In summary, DW considers this draft document is little more than an options paper or conceptual document. It is not a Master Plan. It raises more questions than it answers. The SCAMP is vague, with little information available to gauge potential impacts, either positive or negative, on surrounding community or the environment. Fundamental constraints, such as the surrounding environment including national parks, flood prone land and traffic patterns have not been adequately considered, nor how general aviation and freight will co-exist harmoniously with large-bodied commercial passenger flights. It appears aspects of the EIS and conditions of consent have been ignored. Some of the reasons for abandoning the existing north-south runway appear contrived.

DW strongly recommends that this draft be treated as a scoping document, to encourage the community to suggest alternatives and options for layout and use. The next iteration should provide options and alternatives, fully assessed, with supporting technical studies quantifying constraints, impacts and how these may be addressed. Then a true Master Plan may follow. The current document is totally inadequate to be submitted for "review and approval" by Sunshine Coast Regional Council.

Thank you for the opportunity to comment. If any clarification is required, please contact me on president@developmentwatch.org.au or mobile 0421 679 431.

Yours faithfully

A handwritten signature in cursive script that reads 'Estelle Blair'.

Estelle Blair
President

Attachment 1: Comments on the draft Sunshine Coast Airport Master Plan 2040

Development Watch considers that overall, the SCAMP reads more as an aspirational or conceptual document than a Master Plan. It is vague, with little information available to gauge potential impacts, either positive or negative, on surrounding community or the environment. There are no supporting detailed studies or impact assessments. Fundamental constraints, such as the surrounding environment including national parks, flood prone land and traffic patterns have not been adequately considered, nor how general aviation and freight will co-exist harmoniously with large-bodied commercial passenger flights. It appears aspects of the EIS and conditions of consent have been ignored. Consequently it is considered an inadequate example of a document that is proposed to guide development of an international airport for the next 20 years.

The airport and runway plans shown in the SCAMP are inconsistent with the approved plans as contained in the *Sunshine Coast Airport Expansion Project Environment Impact Statement 2014* (EIS) and the proposed development of precincts north and north west is inconsistent with Commitment 41 of the conditions of consent. Further, there are significant discrepancies between the SCAMP and the EIS. For example, the position and extent of taxiways in the SCAMP is significantly different from those in the EIS. The western end taxiway is a loop, whereas in the SCAMP it runs parallel to and the full length of the new runway.

Secondly, rather than the Air Traffic Control tower (ATC) and the Aviation Rescue and Fire Fighting Service Facility (ARFFS) being positioned halfway along and south of the new runway, serviced by an extension of Airport Drive, these facilities are indicated in the SCAMP in the Airport North Precinct, to the north east of and remote from the runway, in the middle of the wallum management area and Ground Parrot habitat, thus significantly impacting and fragmenting the area. No service road is illustrated, which would further fragment the area. The Coordinator General's Report states in its conclusions that "In addition [to the conditions and recommendations made by the Coordinator General], it is expected that the proponent's commitments will be fully implemented as presented in the EIS documentation and summarised in Appendix 4 of this report." Those commitments included managing this area for conservation.

The only mention of ancillary building works in the EIS is in 5.6, where 59 words are used to describe the demolition and reconstruction of the terminal complex (5.6.1), and 158 words to discuss the relocation and construction of the ATC and ARFFS (5.6.2). There is no mention, let alone impact assessment, of the relocation/expansion of general aviation or freight facilities, let alone multiple development precincts, new road intersections off the Motorway or David Low Way, and new internal roads.

The EIS's Surface Transport Report (B14) mainly discusses construction transport, while the operations section (14.12.6) only discusses traffic directly related to the airport, employees and passengers, and only access via Airport Drive. There does not appear to be any discussion of general aviation traffic, or freight traffic. Accordingly none of the scenarios proposed in the SCAMP have been adequately assessed. Prior to any further consideration or adoption of the SCAMP even as a 'concept plan', a detailed proposal with comprehensive technical reports for, particularly, flood, traffic and biodiversity should be prepared and publicly exhibited.

It has also proved difficult to comment on individual sections, as there is overlap in issues between them. The SCAMP seems to be particularly directed toward monetising the Airport North and Gateway Precincts with limited reference to genuine Airport activities for those areas. Subject to "addressing the flood issue", the SCAMP also proposes inappropriate development of the North West precinct. The absence of any financial information to support these specific proposals is a significant concern.

The SCAMP goes to considerable lengths to purport to present supposedly incontrovertible reasons for abandoning the existing north-south runway. It is strongly suspected at least some, if not all, of those

purported reasons are simply contrived to justify release of the Airport North and Gateway Precincts for general development.

More detailed comments below relate mainly to Section 6 Land Use Plan and Section 7 Ground Transport Plan of the Master Plan, but may also touch on issues relating to Section 9 Environment Strategy.

The Airport West Precinct proposes multiple uses including commercial “once the flooding issue is addressed”. This entire precinct is subject to 1%AEP flood mapping, and is less than 5m AHD. Given that Sunshine Coast Council has apparently adopted a policy affording existing residential communities priority to increase their resilience to climate change to 2100, that is, the allowance to fill existing properties takes priority over any new fill for future development, and that modelling shows the storage capacity of the Maroochy River lower estuary floodplain has been exceeded by the priority fill of current lots, how does SCA intend to “address the flooding issue”? More filling of the floodplain is not appropriate under this policy, particularly west and north parts of the precinct. No additional displacement of water or barrier to flood passage has been included in the decision for the new height of the flood levy protecting Marcoola. Furthermore, it is a concern that “development” of this precinct, including the provision of roads and buildings, and possibly even a solar farm, will impact on and fragment the remnant vegetation around the western end of the runway, thus limiting fauna movement between sections of Mt Coolum National Park.

If a road is constructed from the south western segment into the northern section of Airport West, it will impact on the “wildlife corridor” around the western end of the runway which is inadequate anyway. Later sections seem to indicate that there will be fencing used to keep wildlife off the airport area – how will this address the condition of consent ensuring wildlife movement between the sections of Mt Coolum National Park? It is essential that these two sections do not become ‘island fragments’ vulnerable to stochastic events. Furthermore, where is the proposed location of the solar array in this precinct and how will its position and access impact on the wildlife corridor? Design and position should not impact on free movement of fauna between the two sections of Mt Coolum NP, nor should it be placed in a flood prone area.

It is noted that a new access from the Motorway is proposed to service this area and also enable a road south of the general aviation area (Aerospace Precinct) into the terminal/parking precinct. Has Transport and Main Roads agreed to this? As illustrated, the egress from and access to the Motorway would require revocation of national park land, which is unacceptable as it further reduces the southern section’s size and viability. The proposed road also bisects the ‘wildlife corridor’. Wildlife underpasses (not affected by water courses or drains) must be incorporated into any road design through this area. How this can be done, when the area is so low-lying and flood prone, is unclear. This was not canvassed, or assessed, in the EIS.

The Gateway Precinct is proposed to include “short term accommodation”. This will impact on nearby short-term accommodation establishments such as the Airport Motel at Marcoola, Surfair, Atlantis etc. Have the existing businesses been consulted regarding this proposal and was this included in any financial impact or economic need study?

It is noted there is proposed additional access from David Low Way for heavy vehicles to enter this precinct. Again, has this proposal been supported by Transport and Main Roads? Will this necessitate another set of traffic lights, or is all heavy traffic expected to arrive from the west, off the Motorway? An impact assessment must be undertaken for traffic and transport prior to any further consideration of the SCAMP. In addition, there appears to be a rail corridor through the southern section of Mt Coolum National Park into the terminal area, further impacting on this vulnerable section and its biodiversity. An on-ground route (possibly not feasible due to the swampy nature of the terrain) would require revocation of part of the park, which is unacceptable, as it further fragments the ‘island’ of vegetation. Alternatively, the rail link could be

elevated, similar to that servicing Brisbane Airport, but it is not likely that the number of passenger/aeroplane movements could justify the expense, even by 2040. In any event it would still require revocation of a corridor through the national park. CAMCOS and light rail was specifically excluded from the EIS Surface Transport study. Thus an impact assessment should be provided prior to any further consideration of the SCAMP.

Airport North Precinct – Contrary to what was stated at the first Information Day at North Shore Community Centre, this Master Plan clearly shows – and discusses – heavy transport access from David Low Way approximately through the former Bridgestone site north of the main Marcoola shopping/tourism precinct. This would necessitate heavy transport travelling either through the tourist precinct of Marcoola including through a very tight roundabout or travelling the length of the David Low Way from Coolum Beach, via either Beach Road through a tight T-section or South Coolum Road through residential areas. Both of these options have significant adverse impacts on existing residents, tourists and vehicle usage (eg cyclists) and are not supported. As above, a detailed assessment of transport must be undertaken prior to any further consideration of these proposals.

The Airport Master Plan must include a dedicated internal road for heavy vehicles entering the site via the new heavy vehicle access into the Gateway precinct, to travel along the eastern side of the airport beside the eastern drain north to the freight hub (as was stated at the Information Day). This is the most direct route from the Motorway and would require the least upgrading of David Low Way, and the least inconvenience to heavy and light vehicles alike. There would be sufficient clearance from the taxi-ways for an internal road, and maintenance would then be a business expense of the airport, rather than a costly David Low Way upgrade paid for by the community. A minor access road into the freight hub at the northern end from David Low Way should be designed for cars and light trucks only.

Furthermore, if the “freight hub” is to expand to the extent shown by the designated area, would there not be the opportunity, in time, for freight-only flights, particularly if the “agriculture and fisheries sector” and “premium food and wine” sectors grow as optimistically forecast in section 2. If so, why are there no taxiways indicated for Airport North Precinct to facilitate cargo being loaded directly onto dedicated freight services? As the precinct is illustrated, it seems designed more for a retail/outlet shopping area, than an integral part of the Sunshine Coast Airport business.

Perhaps a more practical design would place the Aerospace precinct (general aviation) in Airport North Precinct, and the freight hub in the area reserved for aerospace use. In this scenario, general aviation would be closer to the tourism market (at Marcoola) and separate from large-bodied commercial aviation, while a large-scale freight hub would occupy a more logical position closer to the Motorway and large commercial services. The northern section of the existing runway could be reactivated for light aircraft use. Alternatively, general aviation could remain where it is and the freight hub could be placed in the southern part of Airport West Precinct, serviced from a Finland Road exit subject to “the flooding issue being addressed”. The wallum heath management areas supporting ground parrots could then recolonise at least the western part of Airport North precinct, as per the commitment in the EIS.

In summary, DW considers this conceptual document fails as a Master Plan to guide future operations of the Sunshine Coast Airport. It should be redrafted and submitted to both the Coordinator General and the Sunshine Coast community as an options paper for review, together with detailed financial and technical studies showing the feasibility or otherwise of the various proposals. This document needs significantly more work before it can be submitted to Sunshine Coast Regional Council for “review and approval”.

DW 6 August 2019