

Comments on the Sydney Airport Preliminary Draft Master Plan 2033

8 October 2013

Southern Sydney Regional Organisation of Councils

Mr Ted Plummer
Manager – Government and Community Relations
Sydney Airport Corporation Limited
Via email: masterplan@syd.com.au

Dear Mr Plummer

Thank you for the opportunity to review the Sydney Airport Preliminary Draft Master Plan 2033 (PDMP). We support the development of the new Master Plan and hope you find the following comments useful.

1 Introduction

Southern Sydney Regional Organisation of Councils (SSROC) is an association of sixteen Councils formed for mutual benefit through collaboration and cooperation. Member Councils deliver and maintain in excess of \$20 billion in local infrastructure and other assets across an area covering more than 600 square kilometres, with a population approximately one quarter of the population of greater metropolitan Sydney.

Alongside the neighbouring Port Botany Container Terminals, Sydney (Kingsford Smith) Airport is arguably the most critical piece of infrastructure in our region. It is a key economic driver locally as well as to the state and national economies. The region benefits from Sydney Airport in terms of diverse and concentrated employment opportunities and accessibility to airport facilities and services.

However, the Airport's footprint is large, and when flight paths are taken into account, its impacts are felt across the region and beyond. As the regional collective of Councils under the flight paths of airlines and in which the Airport is situated, it is our duty to bring to your attention some of the negative impacts of our close proximity to the Airport, such as aircraft noise and road traffic congestion.

To be fair, the Airport is not necessarily directly or solely responsible for such impacts, but has a key role in seeking to mitigate them. Macquarie Bank, as controllers of the Airport through the Sydney Airport Corporation Limited (SACL), could also be doing more to advocate for the development of a second airport to support Kingsford Smith as Sydney's primary airport.

SSROC appreciates the efforts that SACL is making to engage with stakeholders including local government and communities. We are pleased that the PDMP does not call for regulatory changes to the curfew or aircraft movement caps. People who are affected by aircraft noise should be allowed to benefit from the new, quieter aircraft and we are pleased that the PDMP supports this.

2 Key Issues

2.1 Sydney (Kingsford Smith) Airport – maximum capacity vs maximum efficiency

SSROC notes at page 38 that in 2033, Sydney Airport is projected to handle approximately:

- 74.3 million passengers
- 388,000 passenger aircraft movements
- 1.0 million tonne of freight.

SSROC also notes that “as a consequence of the global financial crisis (GFC) the projected level of passengers in 2029 is around 15% below the 2009 Master Plan forecast” (p2). SSROC questions how the Airport derived its passenger forecasts and whether the GFC was the only variable considered. Given the statement that “passenger demand has grown more quickly than the general economy”(p39) and the population forecasting and air travel demand models presented in other reports, it is difficult to comprehend the assumption that the GFC (which peaked in 2008/09) will continue to impact air passenger demand for the next twenty years.

It is widely acknowledged that Australia weathered the GFC considerably better than many other nations, and that despite an economic downturn that ended by mid-2010, passenger numbers have increased over the past decade with an annual rate of growth exceeding 5% per year.

Airport developer Davis Langdon’s Aviation Sector Insight report Airport Terminals - Planning for Long Term Growth¹ states that, notwithstanding the GFC and currency fluctuations, Australian passenger demand is expected to continue growing between 4%-6% annually to 2021. The PDMP forecast of 3.4% to 2033 is a lower and longer ranging forecast and may be overstating the depth of impact of the GFC and the capacity of Sydney Airport to meet demand growth over the next two decades.

The Commonwealth Bank of Australia’s *Sydney versus the World*² report suggests that Sydney Airport will require additional infrastructure such as a new runway, terminal or a second site by 2025, at which point it will be fully constrained by increasing passenger demand. This is consistent with the broader international context in which Davis Langdon states that airport operators are planning and implementing substantial investment in additional airport capacity, including provision for future expansion and operational efficiency in order to keep up with demand and passenger expectations. As an example, London - with a population akin to that projected for Sydney in 2031 - is presently seeking a site for its **fifth** airport.

With a footprint of 800 hectares, Sydney Airport is the smallest capital city airport and cannot expand any further. Sydney Airport’s ageing infrastructure has significant limitations, particularly in terms of facilities management and the need to upgrade below-ground services. While consolidation of existing infrastructure such as the integration of terminals is supported as a means by which to reduce the need for inter terminal transfers and improve airfield capacity and safety, it will not be sufficient to support the doubling of patronage to 2033.

The development context and land use planning outlined in the PDMP is largely consistent with the 2009 Master Plan (p.11) and the PDMP concludes that “Sydney Airport is able to accommodate forecast traffic demand beyond the 2033 planning period, within the current operating regulations” (p.16) and therefore does not seek to alter the regulatory framework, create new runway or terminal infrastructure or seek a second site in order to meet passenger demand.

¹ Davis Langdon 2011, at <http://www.davislangdon.com.au> accessed 8 August 2013

² 'Sydney versus the World', Commonwealth Bank of Australia 2013

Where the PDMP does commit to infrastructure development, it is in the context of upgrading facilities and improving integration with the broader physical environment through road network changes to improve traffic flow. SSROC is cautious about any new airport infrastructure development that would further exacerbate traffic congestion, pollution and noise levels within our region and agrees that new major infrastructure development on the Sydney Kingsford Smith site is not warranted. However, we do not agree that more efficient operation of existing infrastructure will be sufficient to meet demand up to and beyond 2033: SSROC is of the opinion that a second airport will also be required.

Sydney Airport states that it supports the core elements of the Joint Study into Aviation to:

- Optimise the use of Sydney Airport as the primary airport for Sydney and NSW for international, domestic and regional passengers, by ensuring that it operates efficiently and can grow to its maximum practical operational capacity;
- Optimise the use of other existing airports serving the Sydney region; and
- Select a site for a future supplementary airport in the long term, and ensure operations commence at the appropriate time.

SSROC contends that the PDMP confuses maximum capacity with maximum efficiency where it is not possible to have both (at least not at the same time). SACLs primary goal to maximise operational capacity at the Airport will undermine its own efforts to relieve traffic congestion and thereby improve efficiency outcomes.

As a key driver of the economic fortunes of both the state and the nation, Kingsford Smith itself needs a supporting airport to enable it to operate efficiently and reliably within its limitations (not necessarily to its greatest capacity) and thereby remain one of the world's premier Airports.

SACLs reluctance to acknowledge the limits of Kingsford Smith and provide only passive support for a second airport site is self-defeating, and works against the broader economic interests of the state and the nation. In addition, Sydney's south-western growth centre will require a significant economic catalyst – such as an airport – to support escalating population and employment demand and support positive social and economic outcomes across the region, just as Kingsford Smith does in the SSROC region. We note the increasing support in Western Sydney for an airport at Badgery's Creek as part of an economic development plan for the region, and would urge SACL not to obstruct this initiative.

In failing to acknowledge future capacity issues SACL is creating a barrier to plans for a second Sydney airport, and creating a problem of inequity for people who do not have easy direct access to Kingsford Smith. That group is expanding more rapidly than the rest of Sydney, with the population of Western Sydney in particular, already the size of Adelaide (which has its own airport), and set to grow to 3 million by 2036. SSROC contends that Kingsford Smith could not adequately service the demands of this population, and that SACL could actively support the development of a second airport: while that might break SACL's current monopoly, demand for services out of Kingsford Smith could still grow to that airport's maximum capacity. SSROC suggests that SACL could note the analysis by Deloitte Access Economics in the report for the NSW Business Chamber, *Economic Impact of a Western Sydney Airport*³.

2.2 Freight Development Concept

The PDMP states that Sydney Airport's airfreight task is expected to double to one million tonnes by 2033. The Airport handles approximately 48% of all Australian international airfreight – 76% more than any other any other Australian airport and with 80% on passenger aircraft, providing important business to airlines in non-peak periods (p.90). The PDMP acknowledges that airfreight is a key business operation and contributes significantly to the community and the economy.

³ Available: <http://www.nswbusinesschamber.com.au/Lobbying/Thinking-Business> accessed 19 August 2013

Although the PDMP acknowledges the need to increase freight rail capacity in general, there is no Airport context presented. The PDMP only addresses onsite logistics and fails to acknowledge the real economic and social impacts of the growing freight task on landside traffic congestion, which will undermine efficiency by causing delays to check-in processes and aircraft schedules.

Given the growing airfreight task at Sydney Airport and the lack of planning for airfreight in the NSW Ports and Airports Strategy, SSROC would like to see SACL make a stronger case for freight rail freight infrastructure and intermodal development around the Port Botany/Airport precinct to relieve pressure on surrounding roads.

2.3 Addressing and mitigating regional impacts

The close proximity of a major international airport to densely populated residential areas can significantly impact on the health and well-being of individuals and communities. The PDMP acknowledges that many people who live in the vicinity of Sydney Airport are also employed at the airport and can be most affected by Airport operations. Although not solely or directly responsible for all of these impacts, SACL has a key role in addressing and mitigating them both independently and in conjunction with other stakeholders including local government.

Council encourages SACL to take a corporate citizenship approach to practices that would benefit Sydney Airport and those entities affected both indirectly and directly by Airport and aircraft operations. Sydney Airport is not a stand-alone entity but a key driver of economic and environmental outcomes on both a local and national scale. Consultation with key regional stakeholders would enable more effective integration of the Airport within wider built and non-built environments and improve strategic planning and the management of economic, environmental, social and cultural outcomes.

2.3.1 Traffic Congestion

Road traffic congestion reduces the ability of Sydney Airport to operate efficiently by causing delays to passengers with flow-on effects for Airport operations and aircraft movements. Although SACL has been working with the NSW Government to make changes to road access in and around the Airport, at the same time, SACL seeks to maximise capacity at Sydney Airport by doubling passenger movements over the next twenty years.

While SSROC supports the road-bases initiatives proposed in the PDMP including the one-way ring road, changes to internal road configurations and the proposed separate bus entry as a means by which to improve local traffic flow, SSROC contends that such actions will not be sufficient or provide sustainable capacity improvements to support SACLs growth plan.

Traffic movements around the Airport are going to increase substantially due to population growth, freight demand from the expansion of Port Botany and urban consolidation in neighbouring suburbs. Only some of this activity will be related to Airport operations and benefit from changes to roads that directly feed the Airport. A large proportion of local traffic is simply trying to get around the Airport, not into it. SSROC also has concerns about the traffic modelling that the PDMP excludes or is unclear about. These include the:

- “tens of thousands of daily meeters and greeters” referred to in the 2009 SACL submission to Infrastructure Australia;
- nearly doubling in air freight at Sydney Airport from 615,378 tonnes in 2012 to 1,011,312 tonnes in 2033 (p.11) and lack of supporting infrastructure;
- movement to off-site aircraft maintenance and various governance and administrative functions of the Airport; and the
- leasing of around 240,000sqm of commercial floor space within the Airport precinct.

SSROC believes that SACL will need to include these variables in traffic modelling to properly assess the extent of traffic-related impacts and to assist in identifying mitigating factors or potential offsets that could improve traffic flow. For example, it is unclear where off-site Airport functions will be relocated, but if it were outside the bounds of the precinct this would have a positive impact on traffic flow. Conversely, the leasing of commercial floor space would have a negative impact, but the Airport could offset this by reducing on-site parking or supplying shuttle bus services for tenants within commercial leasing agreements.

2.3.2 Public Transport

The PDMP advocates for improved public transport, including removing the station access fee on the Airport Rail Link, more bus services and user-friendly interchange and car-parking facilities. However it does not make any reference to previous SACL policy, such as the 2006 'Airport Ground Travel Plan' or the sustainable travel initiatives detailed in 2009 Master Plan, which had a much greater emphasis on active travel to and from the Airport.

SSROC supports the call for more public transport options into and out of the Airport precinct, including more bus services and the removal of the Rail Link station access fee. SACL could also provide more car share pods and free shuttle services from major regional centres/transport nodes including Sutherland, Hurstville, Rockdale, Central and Bondi Junction.

2.3.3 Active Transport

Given the close proximity of the Airport to the densely populated inner-city, Sutherland and Rockdale LGAs where many Airport workers live, there is likely to be considerable latent demand for safe and connected shared cycling and walking paths. The Botany Bay Trail Master Plan, which was developed by SSROC and included consultation with SACL, identified potential shared paths and existing 'desire lines' throughout the Airport precinct as far back as 2006⁴. This report could be referenced in the PDMP as its incorporation into the Airport precinct would help to deliver active transport options.

The PDMP notes that existing infrastructure and facilities, namely the shared pedestrian and cycle routes along the Cooks River and Alexandra Canal on the north side of Airport Drive and the Giovanni Brunetti Bridge connecting to Mascot via Coward Street as well as shower facilities and secure bicycle parking facilities will remain in place during the course of the five year ground transport plan (p. 209) but gives no support beyond that timeframe. SSROC would welcome the opportunity to liaise with SACL on any planned improvements to bicycle/pedestrian access as identified in the Botany Bay Trail Master Plan which is attached to this submission at Appendix A.⁵ The trail map around the Airport (Plan 3) is at Appendix B. Other supporting maps can be downloaded from www.ssroc.nsw.gov.au/publications.

2.3.4 Maximising Efficiency

Ultimately, however, SACLs primary goal to maximise Airport capacity will work against any attempts to relieve traffic congestion and improve efficiency outcomes. The road network does not have the capacity to be altered enough to accommodate future volumes of passengers, even by SACLs arguably understated forecasts. This is why SACL should focus on maximising efficiency, not capacity, and actively engaging in the planning for a second Sydney airport.

Where SACL is seeking off-site placement of Airport functions, SSROC advises SACL to consult with surrounding Councils to identify suitable industrial lands and commercial spaces that are close to public and active transport infrastructure and which will maximise the benefits of the Airport for local communities and ensure the efficient use of land near to the Airport precinct.

⁴ Botany Bay Trail Master Plan p.24 accessed 8 August 2013

⁵ Ibid, noting site assessments between pages 19-33 accessed 8 August 2013

2.3.5 Noise Mitigation

The Airservices Sydney Basin Aircraft Noise Information Report Quarter 1 2013 (January to March)⁶ states that:

- Approximately half of all the jet approach flight paths into Sydney Airport overfly residential suburbs the rest are over the ocean...when propeller aircraft are included there are no areas of Sydney that are not overflown by aircraft at some stage.
- Much of the Sydney basin is over flown by arriving jets below 5000ft.
- The trend for jet arrivals at Sydney Airport is to approach the centre... this results in a flight path pattern that is “M” shaped to the north of the airport and “W” shaped to the south.
- The majority of flight paths to and from Sydney Airport are designed to avoid, where possible, residential areas and share the noise equitably (resulting in) 12 almost equally spaced distinct flight paths into and out of the airport.

Within the SSROC region, the majority of complaints regarding aircraft noise comes from residents in the Leichhardt and Randwick LGAs. Most complaints relate to increasing frequency of flights overhead, but the report states that the main reason for this is that incoming aircraft take a single, direct path the centre of the airport while outbound flights tend to spread out more and therefore the noise is more evenly dispersed.

SSROC notes that the quarterly reports indicate typical seasonal fluctuations in aircraft noise, meaning that noise, and subsequently noise complaints, tend to be more of an issue over the summer months.

The PDMP states, however, that growth in air travel means that noise sharing modes will be used less often over time. That is, there will be less capacity for noise respite through alterations in flight paths because all will be working at near-to-full capacity. The PDMP commits to support the sharing of aircraft noise as equitably as possible over the planning period (ie. to 2033), but SSROC questions whether noise sharing modes will remain operationally effective to 2033, let alone beyond that time.

To counteract the impact of more aircraft movements and associated noise impacts in the years to come, the PDMP outlines initiatives that SACL has undertaken to enable airlines to invest in new generation, quieter and more environmentally sustainable aircraft with larger carrying capacities.

The PDMP states that noise levels have fallen by approximately 10 decibels since the 1970s, and that in the SSROC region, the introduction of A380 aircraft and the new Australian Noise Exposure Forecast (ANEF 2033) map that allows for A380 noise tracking, has seen noise energy reductions in the Leichhardt LGA by 59% for departures (-3.9 decibels), and 38% (-2.1 decibels) for arrivals. However, an alternative measure has indicated that the Kurnell peninsula at Sutherland will experience increasing N70 Contours.⁷

SSROC welcomes these initiatives and encourages SACL to continue to work with all levels of government to develop implement effective and appropriate land use and planning controls and acoustic standards to national standards and international best practice.

2.3.6 Environmental Impacts and Action Plans

SACLs development of various action plans (EAPs) under the umbrella of an Environmental Strategy demonstrates commitment to improved environmental and wider sustainability outcomes. These plans include the Climate Change and Energy Management EAP, Water Conservation EAP, Waste and Resource Management EAP and the Biodiversity and Conservation EAP.

⁶ <http://www.airservicesaustralia.com> accessed 8 August 2013

⁷ Sutherland Shire Council Meeting of 19 November 2012, Minute Number 357, at <https://sscebp.ssc.nsw.gov.au>

SSROC makes the following brief comments against specific EAPS under the Airport's Environmental Strategy 2013-2018:

Water Conservation EAP:

- more information on the Airport's performance including conservation, treatments and outcomes relating to stormwater and wetlands;
- development of an extensive sampling regime in the course of future master plan development;
- new reporting mechanisms for water and energy management now that ESAP and WSAP reporting processes are defunct.

Biodiversity and Conservation EAP

- need to align airport biodiversity and conservation strategies with similar strategies by key stakeholders (Councils, Sydney Water, Cooks River Alliance etc)
- more information on the Airport's wetlands management plan and goals/outcomes including relationship between wetlands management and bird strike impacts

Waste and Resource Management EAP

- lack of base line data, and detail in relation to implementation and assessment of waste management outcomes
- Recommended that Sydney Airport adapt sustainable procurement, organic waste treatment and waste reduction programs.

As in other areas of the PDMP, there is scant detail about the mechanisms and measurements proposed to demonstrate improved outcomes under the EAPS. The plans, with the exception of the more detailed Climate Change and Energy Management EAP, tend to be focused on qualitative as opposed to quantitative outcomes, where a much more balanced perspective would be more useful incorporating baseline data, objectives and targets, implementation plans and achievements/outcomes.

The Climate Change and Energy Management EAP provides extensive detailed measurement and reporting relating to aircraft noise and emissions and a similar approach to quantifying problems and treatments should be taken to the other EAPS. SSROC remains concerned that the Climate Change and Energy Management EAP does not address the issue of the specific threat to the airport of sea level rise, when the Botany Bay area has been identified as an area particularly vulnerable⁸.

SSROC considers that Sydney Airport could be doing more to demonstrate corporate citizenship by integrating more effectively within the regional context, such as through participation in regional engagement strategies, shared projects, partnerships and sponsorship of environmental sustainability initiatives.

3 Conclusion

SSROC welcomes the PDMP and acknowledges that SACL faces significant challenges to ensure the efficiency and sustainability of Sydney Airport, which carries a significant amount of social and economic importance to Sydney, NSW and Australia.

⁸ See for example, Mapping Climate Change Vulnerability in the Sydney Coastal Councils Region, available: <http://www.sydneycoastalcouncils.com.au/sites/default/files/systapproachphaseonereport.pdf> accessed: 29 August 2013.

The PDMP identifies a number of initiatives to improve efficiency and capacity at the Airport, but SSROC contends that maximum operating efficiency is far more important a goal for SACL to pursue than maximum capacity. Both maximum capacity and maximum efficiency will not be attainable until a second Sydney airport is operational, and SSROC contends that SACL (Macquarie Bank) should put aside concerns about competition and be more proactive in the development of a supplementary passenger airport in south-western Sydney.

We also hope to see SACL further develop environmental action plans and sustainability strategies in conjunction with regional stakeholders, including local government, to ensure we are collaborating effectively to reduce the residential amenity and environmental sustainability impacts generated by Sydney Airport.

We thank you for the opportunity to comment on the Sydney Airport Preliminary Draft Master Plan 2033 and hope you find these comments useful.

Yours sincerely



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