Draft Submission on Sydney Airport Master Plan 2039

November 2018
1.0 Introduction

Local Government NSW (LGNSW) is the peak body for local government in NSW, representing all NSW general purpose councils and related entities. LGNSW facilitates the development of an effective community-based system of local government in the State.

LGNSW welcomes the opportunity to make a submission on the Sydney Airport Master Plan 2039 (SAMP).

This is a draft submission awaiting review by the LGNSW Board. Any revisions made by the Board will be forwarded in due course.

2.0 Background

Local government recognises the vital role Sydney Airport plays in the economy of NSW as the international gateway to Australia and the air transport hub for regional NSW. It employs thousands of residents in adjoining LGAs including 31,000 jobs on the Airport and the creation of 338,500 jobs across NSW in related industries including transport, logistics and tourism. It contributes over $38 billion to the NSW and Australian economy annually making it one of the most vital pieces of infrastructure in the country.

Councils support the Sydney Airport Corporation Limited (SACL) in its:

- strong advocacy for improved public transport to and from the airport.
- its undertakings on environmental sustainability.
- its ongoing efforts to minimise the impact of aircraft operations on neighbouring communities.
- its commitment to supporting local tourism through sponsorship and partnership programs.
- active role in support community and sporting groups.
- general willingness to engage with key stakeholders including local government.

Councils also have a responsibility to ensure that their communities are liveable with high levels of amenity. As SACL understands, the day-to-day operation of Sydney Airport can negatively impact on the amenity of surrounding communities. It is in this context that the recommendations and requests for further information contained within this submission are made. LGNSW is cognisant of the need to maintain Sydney Airport as a state-of-the-art major international airport within the Sydney region and acknowledges the commitment by SACL to maintaining existing curfews, aircraft movement caps, flight paths and noise sharing.

2.1 Key Areas of Concern for Councils Outside the Sydney Region

Slots for Regional Air Services into the Airport

Local government is a key stakeholder in the provision of aviation services to regional NSW and Australia. It is the policy of LGNSW that all residents of regional NSW should be afforded equitable access to ongoing and reliable air services. Modern and efficient air services between regional areas and the state capital are essential for the social and economic well-being of all residents, and particularly for those who increasingly rely on air travel for access to the wide range of services no longer available outside Sydney. This includes travel for essential business, education, and medical purposes.

It is important to note that a viable competitive and accessible regional aviation sector is not beneficial only to regional based customers. It is also vital that Sydney-based professionals, administrators and investors with responsibilities or interests in regional areas have efficient access to regional aviation services on an equitable basis.
In a general sense, regional communities remain concerned that while the existing licensing arrangements have been adequate, the reliability of individual operators and services has been marginal in some cases. The continued uncertainty in the regional aviation industry highlights the need for a policy response by both the Commonwealth and State Governments to ensure the availability of air services to country areas and equitable access by these services to Sydney Airport.

**Recommendation:**
It is vital that SACL:
- increases the availability of slots for regional air services into Sydney Airport.
- reserves the availability of underutilised slots at Sydney Airport incurred because of the current pilot shortage.

### 2.2 Key Areas of Concern for Councils in the Sydney Region

In reviewing the SAMP, councils in the Sydney Region have advised LGNSW of their key areas of concern:

**Increased Aircraft Movements and Noise Management**

Local government acknowledges the SAMP commits to no changes to the existing curfew arrangements; no change to the aircraft movement caps; no changes to noise sharing arrangements; and no new flight paths or runways. However, it is clear that there will be a worrying increase in the intensity and frequency of flight operations projected over the coming years within existing legislated flight caps.

**Recommendation:**
LGNSW requests that SACL provide:
- more information on the restricted aircraft movements on capacity and opportunities for changes that do not negatively impact adjacent communities.
- more information on what impact the expansion of morning and afternoon peak aircraft movements and an increase in low cost carriers will have on the adjacent communities particularly in relation to noise.
- more information on whether there is a change predicted for the number of international passenger aircraft arriving in the 5am-6am curfew.
- more details about the impact of the changes to the n70 contour (which is the range at which conversation and associated activities can be disrupted) and what mitigation measures will be put in place to minimise this impact on local communities.
- information on opportunities to reduce the Sydney Airport’s aircraft noise footprint.
- ensure that the potential for increased frequency of flights not be used as a pretext for arguing for a change existing movement caps or a change to existing curfew hours.

**Equitable Distribution of Noise Sharing**

As the SAMP notes, managing noise from aircraft operations is an important environmental issue and is of ongoing concern for councils and communities living near the Airport and underneath its flight paths. Councils appreciate that this remains a priority area for ongoing mitigation within the SAMP and the promise to consult and engage with the local community, including publishing relevant and accurate information about noise impacts.

**Recommendation:**
That SACL commits to:
- maintaining existing noise sharing targets.
- ensuring that any unforeseen changes to flight patterns that may result in additional aircraft movement over communities is evenly distributed.
Consideration Being Given to Enhanced Technology to Reduce Noise Impacts

Internationally, airports are employing innovative approaches to aircraft noise mitigation. These approaches are proving successful in reducing the impact of aircraft operations on local communities. We can point to stringent standards that are applied in the European Union and by the UK Civil Aviation Authority.

**Recommendation:**
That SACL considers:
- optimising glideslopes so they can be achieved with lower power on approach.
- encouraging, where possible, lower power take offs through optimised departure management.
- encouraging aircraft manufacturers to implement designs that further reduce aircraft noise.
- investigating new technologies deployed by international airports to help mitigate against increases in noise resulting from intensification of operations.

Increases in Air Pollution from the Intensification of Airport Uses

Air quality in the Sydney Basin is already a cause for considerable concern generally. It is even more of a concern to communities living near Sydney Airport or under flight paths.

**Recommendation:**
SACL fully address concerns about:
- the health and well-being of residents living near Sydney Airport from increased emissions that are likely to result from the increased frequency of aircraft movements described in the SAMP.
- emissions from increased road traffic associated with growing passenger numbers
- emissions from increased traffic associated with completion of the Sydney Gateway Motorway Project.

Environmental Sustainability Concerns related to Water Quality

The Airport uses a lot of water for various maintenance operations on the immediate site. There are ongoing community concerns about the impact that water run-off from the Airport precinct has on land nearby the Airport and from flow on effects to both the nearby residents as well as the local flora and fauna.

**Recommendation:**
That SACL:
- develops stringent targets for the storm water and ground water flow quality leaving the site in consultation with the EPA, Office of Environmental and Heritage and councils.

The Impact of Increased Road-based Freight Movements and Access Limitations

Local communities are already negatively affected by the movement of road freight in and around the airport and on local roads, which affects the amenity of local living conditions. The projected increases in freight movements carried by air will inevitably lead to even more heavy vehicle freight movements on local roads, both adversely affecting amenity, the environment and road congestion.
Recommendation:
That SACL:
- provides more information on any proposed changes to the amount and location of heavy vehicles entering and leaving Sydney Airport because of changes to the freight facilities.
- addresses the Airport’s apparent reliance on the Sydney Gateway to solve freight and access challenges.
- helps mitigate the negative impact on council roads infrastructure caused by the likely increases in freight movement by road.

The Need to Improve Public Transport Access Active Transport Access to the Airport

Councils appreciate that the SACL is a strong advocate for better public transport access to the Airport precinct. The increase in forecast flight operations will have a significant ongoing impact on public transport options to Sydney Airport, which are inadequate now. Unless public transport is improved, it is likely to contribute to further related issues including increased traffic movements on already constrained road corridors and increased air pollution among other issues.

Recommendation:
That SACL:
- investigates with councils the potential improvements that could be made to active transport routes on Sydney Airport land from the south, east and north.
- provides more affordable onsite parking facilities to help improve local amenity currently impacted by residential streets being used for short and long-term parking.
- investigates ways in which public transport options and access are improved to reduce car traffic in and around the Airport.
- investigates the extension of its own bus (or other) services beyond the Airport to supplement existing public transport options for its customers getting to and exiting the Airport precinct.
- removes excessive station access fees that discourage Airport customers from using the existing heavy rail service.
- explores opportunities to provide shuttle services to and from the Airport for Airport staff and employees of businesses located in the precinct.
- considers the potential to include free or included public transport as an inclusion in flight ticketing.
- investigates any other behaviour change incentives that it can apply to customers, staff or freight and logistics services to reduce their carbon and congestion footprints
- continues improvements to end-of-trip facilities at the Airport.

The Need to Adequately Address the Impact of the Master Plan on the Airport-related Land Adjoining the Main Precinct

LGNSW accepts the view that the aviation elements of airports are key parts of the nation’s infrastructure and their planning is a matter for the Australian Government. However, the occurrence of extensive non-aviation commercial developments does not constitute key national infrastructure and therefore does not justify being excluded from state and local planning regimes.

LGNSW maintains that the Federal Minister for Infrastructure, Transport and Regional Development and the Federal Minister for Local Government and Decentralisation actively consult with local government in relation to commercial developments on airport land. Development should be consistent with state and local planning policies and take account of the proposed development on nearby residents, businesses and other transport infrastructure.
Consideration should also be given to charging commercial developments on airport land the equivalent of rates or developer contributions to address any infrastructure requirements and to assist in meeting the overall community needs.

**Recommendation:**
That SACL:
- fully assesses the impact of additional businesses within the Airport precinct as proposed with the SAMP on local businesses in nearby LGAs and on local roads.
- ensures that a sufficient supply of land is maintained (or created) to allow airport and aviation-support land uses to be developed near the airport where business and tourism opportunities could be developed.

2.3 Concluding Remarks

We commend Sydney Airport Corporation its development of the Sydney Airport Master Plan 2039 as it demonstrates an overarching awareness of many of the issues that councils have raised with us. We hope the concerns outlined here will be of benefit in mitigating against the negative community impacts of the Airport operations and will help to ensure that Sydney Airport will be viewed as a benchmark internationally for community-friendly, local-business friendly, environmentally friendly and sustainable transport hub now and into the future. Where we have raised concerns that contain requests for additional information, we ask that this is provided in your response to our submission.

If you require further information about the issues raised in this submission please contact Sanjiv Sathiah, Senior Policy Officer Roads and Transport on 02 9242 4073 or sanjiv.sathiah@lgnsw.org.au

Thank you once again for the opportunity to provide this feedback.