Sydney Airport Community Forum

Mr Scott Charlton
Chief Executive Officer
Sydney Airport Corporation Limited
Locked Bag 5000
SYDNEY INTERNATIONAL AIRPORT NSW 2020

via: masterplan2045@syd.com.au

Dear Mr Charlton,

Re: Sydney Airport Community Forum Submission on the Preliminary Draft Master Plan 2045

On behalf of the Sydney Airport Community Forum (**SACF**) Community Representatives, I write to formally submit the **attached** submission to Sydney Airport's Preliminary Draft Master Plan 2045.

The Sydney Airport Community Forum represents the collective interests of communities impacted by the operation of Sydney Airport. For decades, these communities have carried a substantial and disproportionate burden associated with aircraft noise, safety risk, environmental impacts and long-term health effects. The release of the Preliminary Draft Master Plan 2045 represents a critical juncture in determining whether future growth at Sydney Airport will proceed in a manner that is fair, transparent, safe and sustainable.

The Community Representatives appreciate the opportunity to make this submission and look forward to continued engagement on these critical issues and working towards outcomes that better balance aviation growth with community wellbeing.

Yours sincerely

Ash Ambihaipahar MP
Chair, Sydney Airport Community Forum

11 / 12 / 2025

Sydney Airport Community Forum Submission

Response to Sydney Airport Preliminary Draft Master Plan 2045

Introduction and Context

Sydney Airport occupies approximately 907 hectares of land just 8 kilometres from the Sydney CBD and is one of the most constrained major international airports in the world. It is surrounded on three sides by dense urban development and across Botany Bay by the suburb of Kurnell. Unlike many global cities that relocated major airports to outer metropolitan areas, Sydney extended its runways into Botany Bay and constructed a parallel third runway in 1994.

The opening of the third runway resulted in a major redistribution of aircraft operations over residential areas to the north and south of the airport, causing significant and enduring aircraft noise impacts across large parts of Sydney. In response, the Long Term Operating Plan (**LTOP**) was introduced as a social contract between government, industry and the community. Its purpose was to manage and fairly distribute unavoidable aircraft noise through noise sharing principles, runway mode rotation, and respite.

While LTOP initially delivered meaningful noise relief to many communities, its effectiveness has steadily declined over time. The Preliminary Draft Master Plan 2045 (**PDMP**) now confirms that continued expansion at Sydney Airport will effectively eliminate meaningful noise sharing and severely worsen aircraft noise impacts across already heavily burdened communities.

Passenger and Aircraft Movement Growth

Sydney Airport forecasts passenger numbers will increase from 41.4 million in 2024 to 72.6 million by 2045, representing a 71 percent increase. Aircraft movements are forecast to increase from approximately 301,309 movements per year to 400,004 movements by 2045, a 33 percent increase.

These forecasts demonstrate that Sydney Airport intends to capture the majority of future growth in the Sydney Basin rather than allowing Western Sydney International Airport (**WSI**) to fulfil its intended role as the primary capacity release valve. Independent Commonwealth forecasting indicates that WSI should be handling a far larger share of basin growth by 2045. The PDMP provides no transparency on Sydney Airport's modelling of basin wide demand or the assumed movement split between Sydney Airport and WSI.

If the assumption that aircraft size will increase sufficiently to absorb this growth does not materialise as forecast, pressure on the 80 movement per hour cap will intensify further. This scenario is not properly addressed in the PDMP.

Noise Sharing and the Breakdown of the Long Term Operating Plan

The PDMP asserts that LTOP will continue to operate. However, modelling contained in the PDMP demonstrates that Sydney Airport will operate at or near peak capacity for 12 to 13 hours per day by 2045. This eliminates the practical ability to use noise sharing runway modes that require lower movement volumes.

Noise sharing modes such as Mode 5, 7 and 14A currently require capacity limits between 40 and 60 movements per hour. These modes will become operationally impossible for most of the day. As a result, parallel runway operations are likely to dominate continuously, eliminating meaningful noise sharing.

Data presented to SACF by Sydney Airport, demonstrated that noise sharing modes have collapsed from approximately 6 percent of movements in 2014 to around 0.3 percent in 2024. The PDMP provides no credible strategy explaining how noise sharing will return or be preserved under dramatically higher demand.

The PDMP also omits any serious discussion of compliance with established LTOP runway end targets, which require 17 percent of movements to the north, 55 percent to the south, 15 percent to the west and 13 percent to the east. These targets are already not being met and the PDMP gives no mechanism for correcting this failure.

Respite Impacts

The PDMP admits that some communities north of the airport will experience as little as 1 percent daily respite by 2045. This equates to near continuous aircraft noise from 6 am to 11 pm every day. In peak periods, residents may experience over 400 aircraft movements per day, with aircraft directly overhead every 90 seconds for most of the day.

Communities further north under approach paths will experience nonstop aircraft noise on approximately half of all days. Maps in the PDMP fail to fully represent wider flight path turning areas, thereby significantly underrepresenting the geographic spread of noise impact.

Aircraft Noise Modelling, ANEF and N70 Deficiencies

The PDMP contains significant inconsistencies and technical concerns regarding ANEF and N70 noise modelling:

- ANEF contours appear to shrink despite forecast increases in movements, heavier aircraft, increased freight carriage and reduced noise sharing.
- ANEF is known to be insensitive to large increases in flight frequency and is not a suitable standalone community noise assessment tool.
- Errors exist in contour labelling within the ANEF figure.
- The PDMP fails to present noise data below ANEF 20 and N70, despite clear evidence that communities beyond these thresholds experience substantial cumulative impacts.
- Comparative 2024 operational data is omitted from 2045 noise maps, preventing meaningful public comparison of current versus future noise exposure.
- Critical flight path information including corridors such as Marub is not consistently reflected between N70 and ANEF diagrams.

Due to these inconsistencies, the Community Representatives of SACF maintains that an independent review of ANEF and N70 inputs and assumptions is essential.

Quieter Aircraft Claims

While newer aircraft are marginally quieter on a like for like basis, there is no such thing as a quiet aircraft. Forecast increases in aircraft size and loading mean that take off noise in particular will worsen, not improve. Manufacturers' ideal condition noise testing does not reflect real world operations involving weather, terrain, thrust and climb variability.

There is no real-world comparative analysis using Airservices monitoring data to demonstrate material reductions in community noise. Claims of future noise improvement in the PDMP therefore remain unsupported.

Operational Changes That Will Increase Noise

Sydney Airport proposes:

- Increasing crosswind limits from 20 to 25 knots; and
- Allowing jet aircraft departing north to use less than full runway length.

Both changes will increase community noise impacts while reducing safety margins. The full-length departure requirement is a long-standing ICAO recognised noise abatement procedure. Its removal will increase low altitude noise impacts in northern communities.

Increased crosswind limits are designed to reduce the need to revert to single runway operations. This would further entrench continuous parallel runway usage and permanently eliminate noise sharing. CASA has not supported the increase to the limit and pilot groups have expressed opposition to this change.

Increasing crosswind operating limits in close proximity to large vessels within windshear envelopes further elevates safety risk during take-off and landing operations. The PDMP fails to adequately acknowledge this combined hazard environment.

Community Engagement Failures

The PDMP asserts for stronger community engagement. The experience of affected residents demonstrates the opposite. Noise affected communities report:

- Transparency of information from Sydney Airport and Airservices;
- Repeated refusal to meet affected community groups;
- Concerns on genuine consultation forums ;
- Use of safety classifications to bypass proper public consultation;
- No respond to formal written submissions; and
- Revised flight paths implemented without appropriate modelling or engagement.

Flight Path Concentration and Monitoring

Eastern Sydney communities experience highly concentrated jet departure corridors, particularly off Runway 34R. These paths are only a few hundred metres wide while parallel runway separation is over one kilometre. This concentration produces intense repetitive noise exposure without lateral respite.

SACF supports the installation of a permanent noise monitor in Paddington to capture impacts from the 34R departure corridor and helicopter operations.

It would also support the addition of two monitors off the western runway, given the facilitated changes additional noise impacts.

Helicopter Noise

The PDMP gives minimal recognition to helicopter noise. Sightseeing and charter helicopter flights operate frequently on fine weather days along standardised routes, producing prolonged and repetitive noise. Monitoring shows helicopter noise events recorded between 81.8 dBA and 84.0 dBA. Communities affected by helicopter noise require formal recognition and management.

Kurnell Development Safety

The PDMP fails to address the safety implications of proposed high rise residential development at Kurnell directly under current arrival paths. Any major new development under approach corridors requires explicit safety review and potential flight path reconsideration. No such assessment is included.

The Kurnell Community had also been led to believe that the LTOP could be used to minimise the impact on their community. This has not been the case thus far, and the current Masterplan does not indicate any change in these plans.

PFAS Contamination

PFAS contamination from historic firefighting training activities is a known legacy issue spanning over two decades. Investigations occurred in 2005, 2008, 2012, 2017 and 2020 but all detailed data remains unpublished.

Independent reporting has disclosed PFOS concentrations exceeding safe recreational water limits by orders of magnitude. Public warning signage at Tower Beach remains vague and inadequate. There is no clear public reporting of contamination levels, exposure risks, remediation strategy or accountability.

The PDMP references generic environmental management procedures without detailing specific prevention, remediation or protection measures for surrounding communities. Participation in the PFAS Airport Investigation Program has been minimal, opaque and has not focused transparently on known historical contamination sources.

It is recommended that Sydney Airport publicly discloses full PFAS investigation data and commits to an independently overseen remediation program.

Address Health Impacts of Aircraft Noise

While the PDMP includes extensive discussion of flora, fauna, heritage and sustainability, it devotes general terms to document health impacts of aircraft noise. There is no substantive discussion of:

- Sleep disturbance;
- Cardiovascular risks;
- Cognitive impacts on children;
- Psychological stress and anxiety; and
- Long term community wellbeing effects.

This omission appears inconsistent with the *Airport Act 1996* requirement that Master Plans address environmental impacts and include strategies for managing aircraft noise intrusion.

The PDMP contains no noise insulation program for existing communities impacted by expansion. SACF Community Representatives support the introduction of a Noise Insulation Grant Program consistent with recent Federal Parliamentary recommendations.

Conclusion

Sydney Airport operates within significant environmental and operational constraints. The PDMP proposes a level of growth that is expected to reduce the practical ability to implement noise sharing, limit opportunities for community respite and increase the operational density of aircraft movements. The PDMP also identifies changes that may elevate certain safety considerations and does not fully resolve existing environmental issues, including contamination matters.

The PDMP does not present a comprehensive assessment of future noise impacts, provides limited detail on mitigation options, and does not outline a clear framework for engagement with affected communities. Several safety related matters and contamination issues remain insufficiently addressed within the current documentation.

The commencement of operations at WSI Airport presents an opportunity to distribute aviation activity more evenly across the Sydney Basin. The PDMP, however, indicates that Sydney Airport anticipates retaining a substantial share of future demand, which may limit the intended basin wide redistribution of impacts. Should a fair sharing of noise as envisaged by LTOP not be able to be achieved, then a whole of Sydney Basin approach to demand management needs to be taken with the excess demand directed to WSI.

Based on the information provided, the SACF Community Representatives consider that the PDMP in its current form does not establish a sustainable or balanced long term planning framework and would benefit from further analysis, transparency and refinement.