



Sydney Airport Community Forum

Mr Peter Fitzgerald

**Chair: Sydney Airport
Community Forum**

Ms Maria Patrinos
Community Representative

Mr Kevin Hill
Community Representative

The Hon John Murphy MP
Federal Member for Reid

The Hon Tanya Plibersek MP
Federal Member for Sydney

The Hon Peter Garrett MP
Federal Member for Kingsford-Smith

The Hon Tony Burke MP
Federal Member for Watson

The Hon Robert McClelland MP
Federal Member for Barton

The Hon Joe Hockey MP
Federal Member for North Sydney

Mr John Alexander MP
Federal Member for Bennelong

Mr Paul Fletcher MP
Federal Member for Bradfield

The Hon Malcolm Turnbull MP
Federal Member for Wentworth

Mr Scott Morrison MP
Federal Member for Cook

The Ron Hoenig MP
State Member for Heffron

Mr John Flowers MP
State Member for Rockdale

The Hon Carmel Tebbutt MP
State Member for Marrickville

Mr Alex Greenwich MP
State Member for Sydney

Cr Victor Macri
Mayor of Marrickville

Cr Ben Keneally
Mayor of Botany Bay

Cr Darcy Byrne
Mayor of Leichhardt

Cr Morris Mansour
Mayor of Ashfield

Cr Brian Robson
Mayor of Canterbury

Cr Kent Johns
Mayor of Sutherland Shire

Ms Kerrie Mather
CEO, Sydney Airport Corporation Ltd

Captain Rob Edney
Australian Airline Industry

Mr Warren Bennett
Board of Airline Representatives of Australia

19 August 2013

Mr Ted Plummer

Manager – Government and Community Relations

Sydney Airport Corporation Limited (SACL)

Locked Bag 5000

SYDNEY INTERNATIONAL AIRPORT NSW 2020

Dear Mr Plummer

On behalf of the Sydney Airport Community Forum (SACF) I would like to submit the attached comments on the Preliminary Draft Master Plan for Sydney Airport for 2013-2033.

The Forum met on 2 August 2013 to finalise this SACF submission. I acknowledge that as the SACL representative, you declared a conflict of interest and abstained from the vote. The Board of Airline Representatives of Australia (BARA) representative, Mr Barry Abrams, advised that BARA did not support the recommendation for a reduced movement cap of 60 movements per hour during noise sharing periods, but was otherwise supportive of the submission. All other members at the meeting supported the submission.

I trust that SACL will give due consideration to the comments put forward by the Forum in finalising the Sydney Airport Master Plan for 2013-2033.

Yours sincerely



Peter Fitzgerald
Chair

SYDNEY AIRPORT PRELIMINARY DRAFT MASTER PLAN 2033

SYDNEY AIRPORT COMMUNITY FORUM SUBMISSION

As set out in its Terms of Reference, SACF is a community forum for providing advice to the Minister for Infrastructure and Transport on the abatement of aircraft noise and related environmental issues at Sydney Airport, and is the main body for consultation on the Long Term Operating Plan (LTOP) for the Airport.

The main issue of concern to SACF in relation to the Preliminary Draft Master Plan (PDMP) is aircraft noise, in particular the ability to maintain aircraft noise abatement through the curfew, the movement cap and the noise sharing arrangements set out in LTOP. The number of aircraft movements is the key factor in determining both the levels of aircraft noise exposure and the ability for air traffic controllers to use noise sharing modes, and SACF will focus on aircraft movements.

SACF is concerned that an increasing number of aircraft movements will make LTOP unworkable. Sydney Airport regularly fails to meet the runway end targets set out in LTOP with the current level of traffic, and the forecast growth in aircraft movements outlined in the PDMP will further reduce the airport's ability to deliver noise sharing.

SACF is also concerned that the PDMP seriously overestimates the rate of growth in aircraft loadings over the term of the master plan, and this will result in even greater numbers of aircraft movements, that will further reduce the ability for the airport to deliver noise sharing to the point where LTOP will no longer be able to operate as intended. The PDMP appears to be based very much on a best case scenario of aircraft utilisation, rather than one consistent with the independent views of the Bureau of Infrastructure, Transport and Regional Economics (BITRE) and the Joint Study on Aviation Capacity for the Sydney Region. There is also no sensitivity analysis to inform the consequences of failure to achieve the assumed aircraft utilisation.

Finally, and perhaps most importantly, SACF is concerned that the PDMP seriously misrepresents the ability of Sydney Airport to cope with long-term air travel demand. Acceptance of this position could lead governments at all levels to defer action on the construction of a second Sydney Airport and supporting infrastructure. As the Joint Study on aviation capacity in the Sydney region notes, inaction on additional aviation capacity for Sydney would come at a cost of \$34 billion in lost GDP and cost the creation of 17,300 jobs annually. It would also spell the end of Sydney Airport's Long Term Operating Plan (LTOP).

The Long Term Operating Plan

LTOP was introduced in 1997 in the face of overwhelming public opposition to aircraft noise resulting from a very high level of use of the parallel runways for arrivals and departures over the northern suburbs. It aims to put as many flights over water and for the remaining flights to be shared between the other three directions as equally as is operationally feasible.

The LTOP runway end targets are 55% for the south, 17% for the north, 13% for the east and 15% for the west. While the targets for the south and the east are sometimes met, the targets for the north and the west have never been met, with movements to the north significantly above the target and movements to the west significantly below.

There are ten noise sharing runway modes under LTOP, including two modes (Modes 9 and 10) which use the parallel runways exclusively. Although they are part of the noise sharing arrangements, these parallel runway modes account for an unacceptably high and growing share of all movements -averaging 82.5% of all aircraft movements for the five years 2008-2012. Because LTOP does not draw a distinction between parallel runway modes and other noise sharing modes, it is sometimes argued that LTOP is still working even when parallel runway operations are used all day. Clearly this is not in the spirit of LTOP, which was designed to provide respite from parallel runway operations.

LTOP has survived for so long because it is a reasonable plan and was designed with community and industry consultation and support. It recognises that aviation is an essential service but also that residents need to have reasonable respite from aircraft noise and it seeks to balance those conflicting interests in a way that is fair and reasonable.

However, as the number of aircraft movements increases, it becomes impossible to share aircraft movements fairly. While Sydney Airport Corporate Limited (SACL) claims that it will still operate the airport in accordance with LTOP, it will be operating the airport at a level of traffic where LTOP can no longer do what it was designed to do – that is to share aircraft noise fairly.

The Joint Study on aviation capacity in the Sydney region reported Airservices Australia's conclusions that:

- There are already some issues with utilising the full range of LTOP modes (of the 10 modes, four are either currently experiencing limits or will do prior to 2015); and
- Utilisation of the LTOP noise-sharing modes will reduce to zero over time with demand growth.

The report further concluded that by 2020, noise sharing modes will only be able to be operated for a small number of hours after 8.00pm each weekday, and on weekends.

Consultation

The Forum notes that SACL has consulted widely and conducted a number of information sessions in surrounding suburbs. Direct engagement with SACL has been sought and the Forum recognises that the consultation undertaken for the 2033 Master Plan is the most thorough since privatisation of the airport. However the level of engagement is limited by a lack of detail in some areas, given the complexity of the issues involved.

Given the experience of SACL members, the Forum aims to provide a critical analysis of the PDMP that can examine its impact on the community. To this end, the Forum is pleased that SACL has acted on SACL's recommendation to make information available in a TNIP Compact Format to allow better understanding of future aircraft noise impact.

However while the PDMP includes the ANEF for 2033 and the N70 contours, the inclusion of N65 and N60 contours in both the PDMP and TNIP package would provide a more detailed picture of the noise impact of forecast aircraft movements.

Scene Setting

The primary underlying message of the PDMP appears to be this – there is no need for Commonwealth, State and local governments and airlines to plan for additional aviation capacity in the Sydney region as Sydney Airport will comfortably accommodate future demand into the second half of the 21st century. In fact, the message appears to be that long-term demand can be even more comfortably accommodated than was anticipated in the 2029 Master Plan. The Master Plan presents what SACF regards as a simplistic twofold strategy to achieve this: (1) that co-location of terminal facilities will level off peak demand and (2) that aircraft utilisation will improve to the extent that far fewer aircraft movements are required to deliver the anticipated passenger growth.

SACF submits that each of these scenarios is unlikely to eventuate. All levels of governments should recognise the need to construct a second Sydney airport as soon as possible to ensure Sydney can deliver the aviation services that support our social and economic well-being while maintaining a more realistic possibility that noise-sharing can be delivered at Sydney Airport.

The PDMP should acknowledge that a decision on building a Second Sydney Airport would fundamentally change its assumptions and recommendations to the extent that the Master Plan would need to be redone.

Forecasts

The PDMP forecasts that passenger numbers will grow by 3.4% per annum, with 100% more passengers using Sydney Airport by 2033. This forecast is consistent with estimates from the Joint Study on Aviation Capacity for the Sydney Region¹ (3.2%) and the Bureau of Infrastructure, Transport and Regional Economics² (3.6%).

However the forecast growth rate for aircraft movements appears low in comparison to other studies. The PDMP forecasts that aircraft movements will grow by 1.2% per annum, with 27% more aircraft movements in 2033. In a technical report to the Joint Study³ Airservices Australia forecast aircraft movements to grow by 1.8% per annum from 2012 to 2020 and by 1.6% from 2020 to 2025. In 2010 BITRE forecast aircraft movements to grow by 2.3% per annum from 2008-09 to 2029-30. Lower growth in aircraft movements is only possible with higher growth in aircraft loadings.

¹ Joint Study on aviation capacity for the Sydney region

http://www.infrastructure.gov.au/aviation/sydney_av_cap/

² Bureau of Infrastructure Transport and Regional Economics (BITRE) Report 117 *Aircraft Movements through capital city airports to 2029-30*: http://www.bitre.gov.au/publications/2010/files/report_117.pdf

³ Airservices Australia 2012 Joint Study of Aviation Capacity in the Sydney Region, Technical Report B4 *Effect of forecast demand on the Long Term Operating Plan for Sydney (Kingsford-Smith) Airport*:

http://www.infrastructure.gov.au/aviation/sydney_av_cap/files/Technical_Papers_Volume_2-Joint_Study_on_Aviation_Capacity_in_the_Sydney_Region.pdf

Analysis of the PDMP forecasts shows that the concentration of jet aircraft can be expected to increase over the planning period. The PDMP includes information on jet aircraft movements in *Figure 14.9 Average daily jet aircraft movements 2033*. This figure shows jet aircraft movements on different flight paths, and by summing up the relevant flight path movements it can be shown that there will be an average of 917 jet aircraft movements per day in 2033. Performing the same calculation on a similar figure in the December 2012 Airservices Sydney Airport Operational Statistics⁴ report indicates that there was an average of 638 jet aircraft movements per day in 2012. This indicates a growth of 44% in jet aircraft movements, compared with the 27% growth in all aircraft movements noted above.

Based on this analysis, there would be a resultant increase in jet aircraft from a share of 72.3% to 81.7% over the planning period, with a net decrease of 16% in non-jet aircraft over the planning period. It is difficult to see how this would occur consistent with the anticipated growth in regional services. There is no evidence that regional services will become jet-based in the near future. In fact, Australian experience has been the opposite, with Virgin Australia recently discontinuing regional jet services and replacing them with turbo-prop services. This is an important point to clarify as jet aircraft are much noisier than non-jet aircraft and are the major source of aircraft noise disturbance and complaints.

The Aircraft Fleet and Aircraft Loadings

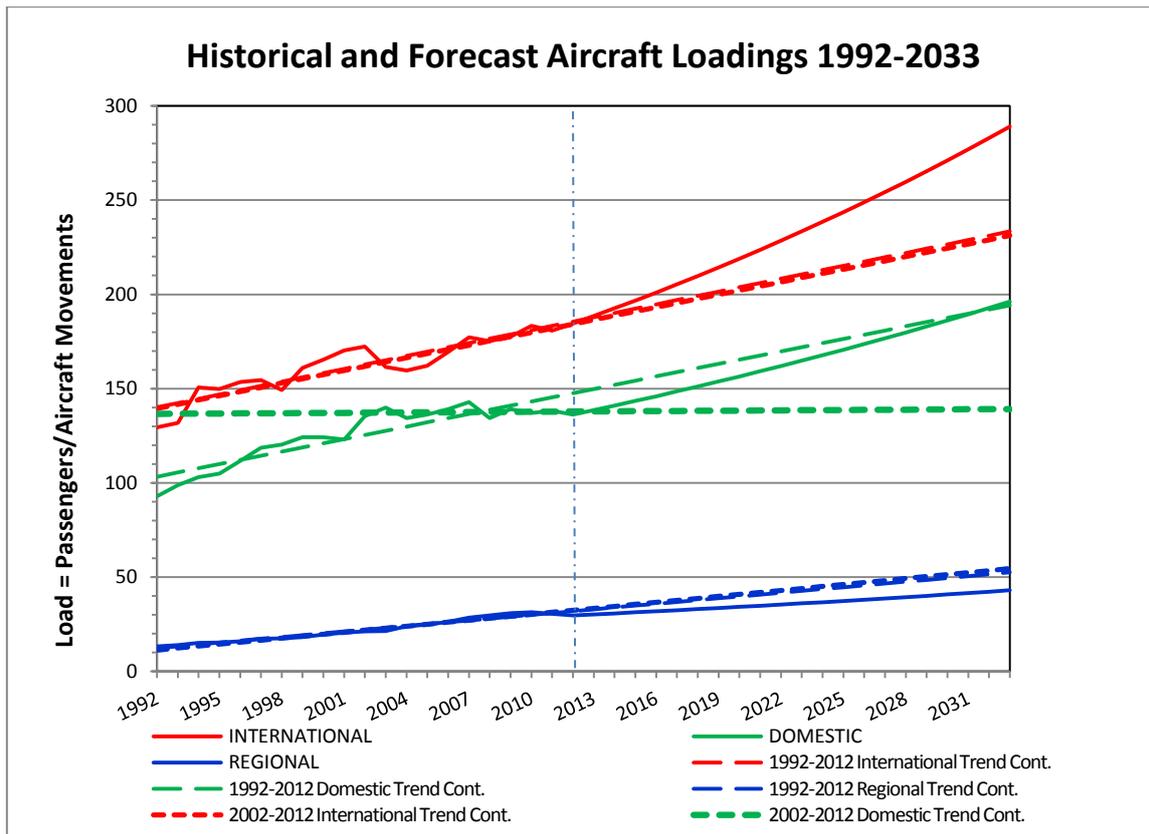
The PDMP provides figures for international, domestic and regional passenger numbers and aircraft movements in 2012 and 2033, and their relevant compound annual growth rates. Overall it predicts passenger numbers to increase by 3.4% per annum and aircraft movements to increase by 1.2% per annum. The key to servicing a high rate of passenger growth with a low rate of growth in aircraft movements is a high rate of growth in aircraft loadings.

Using the forecasts provided by the PDMP, and historical data published by the Bureau of Infrastructure Transport and Regional Economics (BITRE)⁵, SACF has reviewed the key factor of aircraft loadings.

The following graph shows the PDMP forecasts, along with two sets of historical trends for the periods 1992-2012 and 2002-2012. For international and regional aircraft loadings the two sets of trends are closely aligned, but for domestic aircraft loadings, while the PDMP forecast is aligned with the 1992-2012 trend, the trend from 2002-2012 is essentially flat, and would predict significantly lower growth in aircraft loading.

⁴ Airservices Australia Sydney Airport Operational Statistics, December 2012
<http://www.airservicesaustralia.com/wp-content/uploads/Sydney-Airport-Operational-Statistics-December-2012.pdf>

⁵ BITRE Airport Traffic Data 1985-86 to 2011-12
http://www.bitre.gov.au/publications/ongoing/airport_traffic_data.aspx



Following the collapse of Ansett Airlines in 2002 and the entry of low cost carriers into the domestic market, aircraft loadings have shown very little growth at all. If this low-growth trend in domestic aircraft loadings is indicative of an optimal aircraft load for the domestic market, and continues at the low rate it has for the past decade, the forecast passenger numbers would generate an additional 86,000 domestic flights per annum or 240 extra flights per day by 2033. In addition to rendering LTOP inoperable, such a large increase in aircraft movements would generate congestion and delays that would flow on to other airports, causing major disruption to schedules and undermining the efficiency of Australian aviation.

The PDMP argues that new, larger aircraft and higher load factors will reduce the number of aircraft movements. SACF is concerned that the PDMP’s assumptions on domestic aircraft loadings are very optimistic, given the low growth since 2002 and the make-up of current domestic fleets and future orders. In August 2012 Qantas announced that it had substantially completed its fleet renewal program with 114 aircraft delivered over the past four years. The Qantas passenger fleet has an average age of 8.3 years. Virgin Australia has an average fleet age of 4.2 years. The majority of Virgin Australia’s fleet comprises Boeing 737-800 aircraft. Virgin ordered 50 Boeing 737-800s in 2010 for delivery by 2017 and 23 Boeing 737-800 MAX aircraft in 2012 for delivery between 2019 and 2021. Both these aircraft are fuel efficient Next Generation aircraft, with similar passenger capacities to their counterparts in Virgin’s existing fleet and it is likely that they, or similar aircraft, will remain in service for the duration of the planning period.

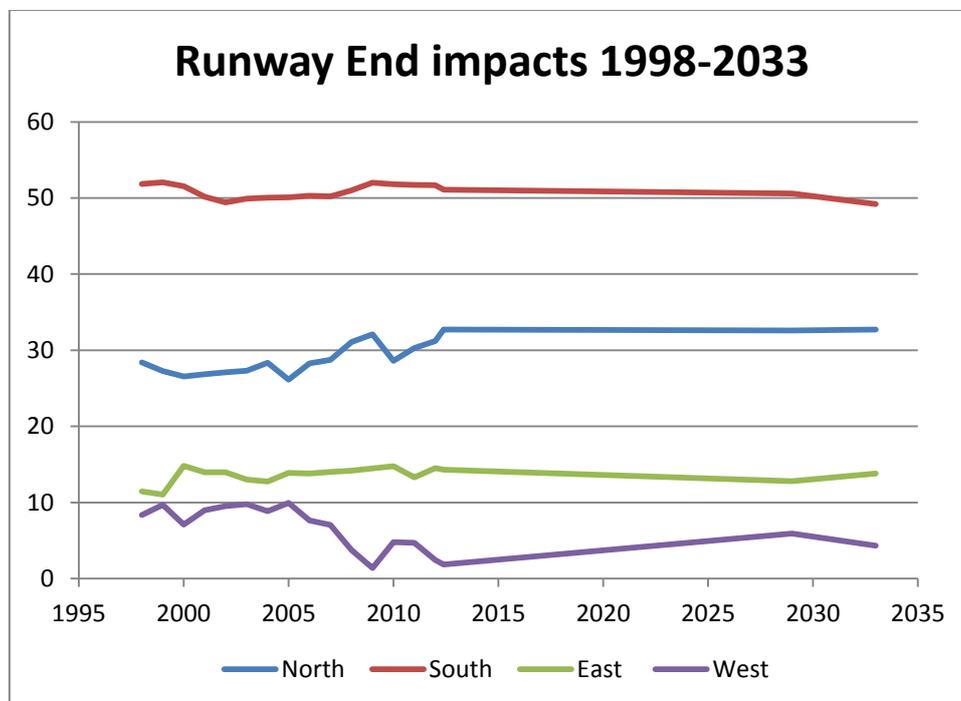
Domestic aviation statistics published by BITRE⁶ in July 2013 indicate that domestic airline capacity is growing faster than passenger numbers and that load factors are falling. It is likely that fuel efficiency not seating capacity will be the major driver for fleet renewal, as fuel savings are not directly dependent on load factors. Other factors, such as increased competition in the business travel sector may result in airlines deciding to provide more business class space and thus reduce aircraft seating capacity.

Given the growth in aviation in Asia and the Middle East there is likely to be continued strong demand for aircraft, and further delays in the supply of new aircraft should be expected. Qantas has yet to receive any of the Boeing 787 aircraft it ordered in 2005 for delivery in 2008, and has deferred orders for 50 Boeing 787s to 2016 and cancelled orders for a further 35.

The PDMP does not include any sensitivity analysis of its forecasts for aircraft loadings, and even a small overestimation of aircraft loadings will have a significant impact on the number of aircraft movements. SACF believes the existing assumptions underpinning aircraft loadings are over-optimistic and encourages SACL to consult more closely with the Board of Airline Representatives of Australia and with domestic airlines to test the assumptions used.

Runway End Impacts

The following graph depicts the actual runway end impacts from 1998 to May 2013 from the Sydney Airport Operational Statistics reports, and the forecast runway end impacts from the 2029 Master Plan and the PDMP for 2033.



⁶ Bureau of Infrastructure, Transport and regional Economics *Domestic Airline Activity* <http://www.bitre.gov.au/statistics/aviation/domestic.aspx>

This graph shows that the rising trend for the north flattens out after 2013, and the falling trend for the west rises after 2013 then falls again after 2029. The PDMP provides no explanation of the means by which these trend changes will be achieved, other than to provide forecast end points. SACF believes that a simple analysis of current trends indicates a continuing increase of traffic to the north and decreasing traffic to the west, essentially converging closer to parallel runway operations over time. Also of concern is the increased reliance on the use of Mode 7, the highest capacity noise sharing mode, which impacts on Kurnell residents.

The following table shows the average daily number of jet aircraft movements over all flight paths for selected suburbs in 2007 and 2012 (actual) and 2029 and 2033 (forecast) based on Figure 14.9 in the PDMP.

Table 1 Average Daily Jet Movements in 2007 & 2012 (actual) with 2029 & 2033 (forecasts) for selected suburbs

AREA OVERFLOWN	TYPE	PATH	2007	2012	2029	2033
North inner (Marrickville)	Arr	A	149	187	314	302
West north (Ashfield)	Dep	B	49	63	115	103
North & North Shore	Arr	C	100	124	200	199
East & North (Harbour)	Dep	D	28	34	46	48
East (Coogee)	Arr	E	20	15	29	26
East & South (Maroubra)	Dep	F	37	53	50	53
Botany Bay Heads	Dep	G	39	53	86	84
South (Kurnell)	Arr	H	134	171	242	221
South Kurnell sand hills	Dep	I	101	109	136	141
Inner West (Rockdale)	A&D	J	38	15	50	42
West (Hurstville)	Dep	K	9	4	24	16
West (Hurstville)	Arr	K	24	9	11	19
West then North-west	Dep	L	7	3	15	7

The following table shows jet respite hours for selected suburbs as a percentage in 2007 and 2012 (actual) and 2029 and 2033 (forecast) based on Figure 14.10 in the PDMP.

Table 2 Average daily jet respite periods (% of period 06:00 to 23:00) in 2007 & 2012 (actual) with 2029 & 2033 (forecasts) for selected suburbs

AREA OVERFLOWN	TYPE	PATH	2007	2012	2029	2033
North inner (Marrickville)	Arr	A	6	6	4	3
West north (Ashfield)	Dep	B	49	49	48	51
North & North Shore	Arr	C	55	55	53	49
East & North (Harbour)	Dep	D	60	60	54	52
East (Coogee)	Arr	E	90	90	88	90

East & South (Maroubra)	Dep	F	59	59	54	52
Botany Bay Heads	Dep	G	43	43	51	48
South (Kurnell)	Arr	H	49	49	48	51
South Kurnell sand hills	Dep	I	47	47	51	48
Inner West (Rockdale)	A&D	J	86	86	79	85
West (Hurstville)	Dep	K	96	96	84	91
West (Hurstville)	Arr	K	91	91	96	94
West then North-west	Dep	L	96	96	84	92

Furthermore, in terms of air traffic volumes, the PDMP forecasts that:

- International aircraft movements will grow at 2.3% per annum, which will result 62% more international flights by 2033.
- Domestic aircraft movements will grow at 1.0% per annum, with 25% more domestic flights by 2033.
- International flights will account for 26.6% of total aircraft movements in 2033 compared with 22.3% in 2012.

International flights involve larger aircraft, and aircraft that are heavily laden on take-off, and this will put more pressure on the use of the parallel runways, particularly the main north south runway (16R/34L).

Standard operating procedures preclude aircraft larger than A330 from using the third runway (16L/34R), and the east-west runway is not long enough to handle long haul flights. This will result in an increasing number of aircraft being allowed to maintain runway heading over northern suburbs on departure from runway 34L, and will essentially recreate the 'Bennelong Funnel' situation that LTOP was designed to address.

Yet despite the forecast increased share of international flights in 2033, the PDMP predicts very little change in the proportion of aircraft that will use the parallel runways, as demonstrated by the forecast runway end impacts which show no change for the north, a slight rise for the east (presumably through more use of parallel runway mode 9) and a slight decrease for the south.

The PDMP also mentions the possibility that aircraft could use steeper angles of ascent and descent. This would have a disproportionate impact on residents living close to the airport, and would change the noise contours on which the ANEF 2033 is based.

Airservices Australia Technical Report to the Joint Study

In a technical report to the Joint Study of Aviation Capacity in the Sydney Region⁷, Airservices Australia analysed the effects of forecast traffic levels on LTOP. A key finding of

⁷ Airservices Australia 2012 *Effect of forecast demand on the Long Term Operating Plan for Sydney (Kingsford-Smith) Airport*, Joint Study of Aviation Capacity in the Sydney Region, Volume 2 Technical Report B4 http://www.infrastructure.gov.au/aviation/sydney_av_cap/files/Technical_Papers_Volume_2-Joint_Study_on_Aviation_Capacity_in_the_Sydney_Region.pdf

this report is that the ability to use LTOP noise sharing runway modes during the middle of the day (1100 to 1500 hrs) will reduce over time as traffic demand increases. Specifically:

- At current levels Modes 5, 14A and SODPROPS are not sustainable between 1100 - 1200 hrs.
- By 2020 Modes 5,14A and SODPROPS will not be sustainable in the middle of the day.
- Mode 7 is sustainable in the middle of the day to 2025, subject to reasonable delay.

The assumptions in this report are that aircraft movements will grow by 1.8% per annum to 2020 and 1.6% per annum from 2020 to 2025. In 2010, BITRE forecast aircraft movements at Sydney Airport to grow by 2.3% from 2008-09 to 2029-30.⁸ Both of these forecasts are significantly higher than the PDMP forecast average growth rate in aircraft movements of 1.2% per annum.

While the technical report notes that Mode 7 is sustainable, it cannot be used in southerly winds. This limitation restricts the options for air traffic controllers to select a noise sharing mode with sufficient capacity to handle forecast traffic levels in the middle of the day. On southerly wind days Mode 10 will be the only option that can handle the forecast aircraft traffic levels by 2020. This will put arriving aircraft over the northern suburbs all day and revert to the situation which LTOP was designed to address. Southerly winds are a regular feature of Sydney's climate and are the prevailing winds during the summer months.

The forecast increases in aircraft movements indicate that by the mid-2020s (and probably earlier) the fair and equitable distribution of aircraft noise will become impossible. The PDMP should demonstrate how noise sharing will be achieved if aircraft movements are allowed to increase to the extent currently forecast in the PDMP.

The PDMP repeatedly claims that it has been prepared on the basis of no changes to noise sharing arrangements and no changes to flight paths. However the Airservices technical report shows that there will be changes to the noise sharing arrangements as increased traffic demand restricts the runway mode options available for noise sharing. It is also difficult to see how SACL can give undertakings about flight paths, which are the responsibility of Airservices.

The Airservices technical report also includes information on wake turbulence separation standards. When an aircraft takes off or lands it can create wake turbulence which can affect a subsequent aircraft movement. Larger aircraft create greater wake turbulence and require greater separation times and distances for following aircraft, particularly when there are no crosswinds. The predicted growth in international aircraft movements will increase the proportion of large aircraft in the fleet mix and can be expected to increase the delays associated with wake turbulence separation on calm days. This is a safety issue, and it is matter of concern that the PDMP does not appear to have taken wake turbulence separation into account.

⁸Bureau of Infrastructure Transport and Regional Economics (BITRE) Report 117 *Aircraft Movements through capital city airports to 2029-30*: http://www.bitre.gov.au/publications/2010/report_117.aspx

The Master Plan as a Planning Document

In an integrated planning environment the Sydney Airport Master Plan will have an impact on the planning activities of State and Local Governments, tourism and other industries, and it is important that it provides an accurate forecast of demand and levels of service for the term of the Plan.

It is of concern therefore that the PDMP appears to have been unduly motivated to deny concerns about Sydney Airport's capacity expressed in the independent Joint Study, without providing sufficient evidence or detail to seriously challenge the Joint Study's conclusions.

SACF has expressed strong support for the development of a second airport for Sydney as soon as possible. While SACL has the first option on a Second Sydney Airport, it also has an interest in getting the maximum benefit out of its existing asset for as long as possible. SACF contends that this has influenced the PDMP and caused it to adopt a defensive position that deliberately downplays the capacity constraints that have been clearly identified in the Joint Study, in an attempt to protect its monopoly position and prevent investment in Sydney's much needed additional aviation capacity.

The over-optimistic position of the PDMP within the larger integrated planning environment only serves to promote apathy within Commonwealth, State and local governments that will further delay planning and investment in a second airport for Sydney. Some sensitivity analyses should be undertaken to assess the effects of different growth rates in passenger numbers and aircraft loadings, so that the risks can at least be quantified and planners can more accurately assess the likelihood of Sydney Airport achieving its projections.

Ground Transport Plan

SACF congratulates SACL for the first Ground Transport Plan under the revised arrangements for Airport Master plans established by the Australian Government. The Ground Transport Plan is a concrete example of the improvements that SACF has long advocated in planning integration on and off airport.

The Forum notes that the forecast doubling of passengers at the airport will impact on traffic and encourages SACL to work closely with State and Local Governments to develop an integrated ground transport plan that can adequately service the airport without adversely impacting on surrounding suburbs. Greater use of public transport would reduce the environmental impact of travel to and from the airport and may play a role in reducing road traffic congestion. Therefore, feedback from individual councils and the NSW State Government should be incorporated where possible into the final draft master plan on these matters. SACF notes however, that the task of accommodating a doubling of passenger numbers on the road network, in addition to other road users and the expanding Port Botany traffic, is going to be very difficult. As in the aviation aspects of the PDMP, the Ground Transport Plan relies on a series of best case scenarios coming together to accommodate demand and deny the need for an additional airport site for Sydney.

The Ground Transport Plan plays a prominent role in managing the impacts associated with people travelling to and from the airport. However, by limiting itself to airport passengers, visitors and SACL staff, the Ground Transport Plan misses a vital opportunity to apply its

objectives universally to the majority of the 28,000 onsite workforce employed by the airport's tenants and operators. SACL has the opportunity in the draft Master Plan to engage its tenants and operators through its lease/commercial negotiations and develop strategies and key performance indicators under workplace travel plans that could assist in uniting efforts to reduce car trips to the airport by the airport's workforce. Due to the constraints that exist with the existing public transport system, alternative measures such as an airport tenant funded park and ride system, car sharing, measures to encourage the NSW State, or Federal, Government to remove the fare penalty for use of the airport's two heavy rail stations⁹, enhanced bus services, particularly to Sutherland Shire and the St George area, including "out-of-hours" services which recognise the varying shift-work demand associated with the airport and other active transport incentives could be employed.

The PDMP proposes that the airport has a total of up to 25,000 on-site parking spaces, nearly doubling the airport's total parking provision. No detailed analysis has been provided regarding the implications (traffic or environmental) of providing such a significant increase to the on-site parking quantum. Consequently it is requested that an overall transport and parking strategy be provided, which includes analysis of the likely impacts of 25,000 on-site parking spaces and proposed initiatives to increased public transport mode share for airport users, particularly employees.

The impacts of traffic travelling to and from the airport affect local council areas in the region through the economic and social costs associated with traffic congestion. Some local councils have expressed the view that the planned changes to traffic arrangements are unlikely to effectively manage the anticipated growth in traffic movements and relieve congestion in the long term.

SACF is also concerned that much of the traffic projected to be created by the future developments in the airport precinct, particularly the new commercial developments, relies on the WestConnex project to provide access and an easing of surface road conditions to the airport. As this project has not yet been approved it is considered that any additional capacity associated with WestConnex should not be considered as available.

Land Use associated with air freight

The PDMP notes that an area north of Airport Drive is planned to be established as an airport logistics zone to support airport freight operations and support facilities providing a direct landside and airside vehicular access. Marrickville Council has expressed concerns that any future increases in air freight activity may have an impact on land in Marrickville LGA and should be averted.

Increased Ancillary Commercial Development

The PDMP proposes significant increases in the total commercial floorspace to be provided in and around Sydney Airport including up to 240,000 square metres of floor space (additional to the terminal buildings); a waterfront development along the banks of the

⁹The Preliminary Draft Master Plan mentions the desire to remove the fare penalty for the airport's heavy rail stations, however it does not propose any measure which would encourage the governments (State or Federal) to take such action.

Cooks River; and two additional hotels of between 200 and 500 rooms. This increased commercial development has the potential to significantly alter the nature of the airport precinct, possibly creating a “destination” separate from the terminals proper. It is considered essential that development of this magnitude should have an overall traffic and transport management strategy including mode share goals, an overall traffic budget and a series of initiatives to ensure both the traffic and economic impacts are acceptable for adjacent centres.

Additionally, traffic demand associated with the workforce of these commercial sectors will require careful consideration. New commercial premises should be developed with measures to encourage increased mode share for public transport including the establishment of individual or precinct Work-based Travel Plans and incentives to encourage the NSW State Government to provide improved public transport services.

SACF Desired Outcomes

SACF is concerned that the PDMP forecasts and the assumptions underpinning them are optimistic in terms of aircraft loadings and fleet renewal and consequently will underestimate the number of aircraft movements at Sydney Airport. SACF recommends the PDMP include sensitivity analysis of its forecasts as even a small overestimation of aircraft loadings will have a significant impact on the number of aircraft movements. SACF also recommends that the PDMP include mode usage forecasts to illustrate the progressive impact of aircraft movements and changes in the aircraft fleet mix on runway mode usage at 5 yearly intervals over the planning period.

SACF notes that noise sharing at Sydney Airport is already under threat and will be further marginalised under the forecast increase in aircraft movements.

SACF is concerned that the forecast increased in aircraft movements proposed in the PDMP will result in a level of noise that is environmentally and socially unacceptable. SACF notes that noise sharing at Sydney Airport is already under threat and the forecast growth will further diminish any opportunity to implement LTOP as originally intended.

SACF is committed to maintaining the curfew in its current form, and the movement cap of 80 movements per hour. In addition the Forum would like to see the 2013-2033 Sydney Airport Master Plan take some real steps to ensure that noise sharing under LTOP is able to operate effectively. In order to do this the Forum proposes that special noise sharing caps of 60 movements per hour be applied for two hours during the morning peak, two hours in the afternoon peak and during the hours 1100-1500 in the middle of the day. The Forum also proposes that these noise sharing caps be applied during the noise sensitive periods of 0600-0700 on weekdays and 0600-0800 on weekends and 2200-2300 every day.

SACF maintains that the objective of growing Sydney Airport to its ‘maximum practical operational capacity’ is inconsistent with the ability to implement noise sharing under LTOP in any significant sense, and with the commitment to no change to the curfew or the movement cap. Hence, SACF strongly urges the government to select a site for a second Sydney airport and begin construction as soon as possible.

SACF proposes that development of supplementary capacity at Richmond Airport should proceed in parallel with the decision on a second airport. SACF urges the Government to define the roles of the Kingsford Smith Airport and the second Sydney airport and recommends that development of alternative aviation capacity for Sydney should be used wherever possible to reduce traffic at Sydney Airport, to enable LTOP noise sharing arrangements to be implemented and provide respite to residents.