

SYDNEY AIRPORT COMMUNITY FORUM INC
SUBMISSION ON
SYDNEY AIRPORT CORPORATION LTD'S
"PRELIMINARY DRAFT MASTER PLAN" JULY 2003
28 October 2003

Contributors:

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SYNOPSIS

The prediction of 412000 aircraft movements per annum to produce 68.3 million passenger movements is totally unsupported by the present ratios [See Para 12] . The present ratio of 93.8 passengers per movement would require a hypothetical 728,000 aircraft movements to produce 68.3 million passengers. This is totally beyond the practical capacity of KSA. If this yardstick of 68.3 million passengers has been used by SACL in its investment calculations, the environmental consequence of 728,000 movements (justifiable by comparison with current overseas experience) will be horrendous for the residents of Sydney. This achievement would likely be possible only with twenty-four hour operations. This submission reveals that with the ANEF projections for 2023-24 put forward by this airport lessee company, approximately an additional 5000 homes involving 12000 residents will become affected at the ANEF 30 level by 2023 [See Para 16.3 , Appendix "C"] .

Similarly the increased numbers of dwellings affected at the 25 and 20 ANEF levels will be in a range from 20,000 to 52000, respectively, making a total of over 70,000 additional affected homes involving nearly 200,000 residents! On the ANEFs provided , the total additional insulation cost for new homes affected at the 30 ANEF level would be around \$500 million. For insulation of all new homes affected above the 25 ANEF level the cost would be in the region of \$2.5 billion!

Yet, the airport lessee company presents these significant environmental data in a "take-it-or leave-it" fashion without due explanation, and without regard to its obligations to *"assess and plan for"* the consequences of the projected environmental impacts as required under the planning obligations created by S. 71(2) of the Airports Act.

For a Master Plan , the Airports Act requires a statement as to what "the airport lessee company" intends to do about impact amelioration and prevention [S. 71(2)]. Instead we are presented with SACL's expectation that Sydney Airport will be given a free ride at the flying -public and taxpayer's expense to ride roughshod over the environmental interests of the ground-bound public, whose homes all across Sydney increasingly lie under the noisiest and lowest departure flight path ceiling of any since Sydney Airport began !

This is a plan for environmental urban vandalism on a scale not seen from Sydney Airport since the opening of the third runway. It is one which should not be tolerated, and one for which the Minister or Ministers responsible would be justified in seeking a full environmental impact statement (EIS) , a fully independent specialist review, and full opportunities for community consultation with public meetings at major affected venues.

The Minister would be ill-advised to give a mere perfunctory assessment and kindly nod "OK" to this proposal. If he does , the eventual cost to the affected Sydney Communities will be immense . The Government in turn should face the fact that this airport lessee corporation must be made liable in tort for the community harm which will result from the proposed expansion of Kingsford Smith Airport given the minimal environmental assessment which is presented.

The "LTOP - noise share" plan behind which this airport lessee company hides for environmental justification has been hijacked and misdirected away from the original goals set by then Minister for Transport Sharp. As evolved the LTOP is not a plan which maximises movements over water as promised. It is a plan which instead maximises aircraft movements, takeoffs, noise and crashrisk over the most heavily populated residential areas of Sydney. Not only does it maximise movement and takeoffs over residential areas, but it maximises the use of low-altitude high noise impact flight path trajectories for both arrivals and departures in the most unconscionable way. This is both harmful to Sydney residents and inconvenient for airlines which use more fuel through failure to reach cruising altitude in optimal time.

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1. Re. Disclaimer (p. 4):

We note that SACL "accepts no liability whatsoever to any person who relies in any way on any information contained in the "Preliminary Draft Master Plan"

Comment: This is a totally unacceptable introduction for a document prepared by a Public Corporation in response to a regulatory requirement to submit its statement of future plans . Given that the human environmental impacts of the proposed expansion of airport use are impliedly immense, though inadequately alluded to in the document, we suggest that this Disclaimer be removed in the final Master Plan for submission to the Minister , otherwise the Minister should seek legal advice as to whether it would be advisable for him to grant approval. If the man-in-the-street cannot "rely" on the information provided, how can a Minister of the Crown be honestly expected to do so?

2. Executive Summary: - Regulatory and Policy Settings (p. 7)

Whilst it is accepted that the corporation comes to its task lumbered with a set of flight path plans which do not comply with the Minister for Transport's Directive to Airservices Australia of March 1996 , viz. "to maximise movement over water and non-residential areas" [John Sharp 20 March 1996], this does not absolve it from the responsibility to ensure that its proposed growth does not lead it to breach common-law requirements not to harm its neighbours. Blindly continuing to consent to use of existing flight paths, when these are known to be causing increasing harm to the health and welfare of its community stakeholders, makes it legally complicit in inflicting the resulting harm, and therefore potentially legally liable for damages.

3. Executive Summary: - Forecasts (p. 7)

These aircraft movement forecasts are consistent with the "whole of Sydney Basin" forecasts from the Department of Transport as provided to PPK for the Badgerys Creek EIS , ie 480,000 +/- 60,000 movements and 49m +/- 9m passengers. But see also comments as to uncertainty of predictions at Para 12 below.

4. Executive Summary: - Environment Management (p. 8)

The so-called "Environment Strategy" ^{#1} referred to makes no undertaking whatsoever as to the "management" (whatever that may mean) of downstream aircraft noise impacts. In fact a major defect of the Environment Strategy, highlighted by the Schiphol Benchmarking Study [Appendix "D" of "Strategy"- See further below at para. 14], was the failure of the airport regulatory system. This is a system which fails to make the airport corporation, which benefits from encouraging and promoting increased traffic flows, directly responsible for the human health and welfare consequences of the environmental impacts of increased aircraft movements over neighbouring residential zones.

5. Section 1.1 Vision

It is observed that "to be a world-class airport management company" ^{#2} does not logically sit well with the "Strategy"-stated objective of "acting as a good neighbour and [undertaking] reasonable and practicable actions to prevent or minimise environmental impacts from the Airport" and "to become world class in managing airport environmental issues" ^{#3} . The PDMP does not properly address the essential and probably unresolvable conflict between the goal of "creating long-term value for SACL and its stakeholders" [para 2] and "achieving an equitable balance between the economic benefits of growth, and the social and environmental impacts of growth."

¹ Henceforth "Strategy"

² PDMP p. 11

³ "Strategy" p. F-i

[Author's emphasis]

It is not clear how the stated goal of creating long-term value for SACL which involves *"planning for new capacity to facilitate future growth at Sydney Airport " ... "while recognising Government policy on issues such as the curfew, movement cap..... etc " [dot point 1] can co-exist with the environmentally essential *"[ensuring] an equitable balance between the economic benefits of growth, and the social and environmental impacts of growth."* [dot point 3] .*

6. Section 1.3 Development Objectives

The PDMP does not adequately address the inherent conflict between *"being a sustainable business, accepted as a responsible and valued member of the community"* [dot point 2] and *"continuing to be an environmentally responsible airport."* [dot point 8].

SACF Inc believes that Sydney Airport **has not been** an environmentally responsible airport for at least a decade now, and therefore cannot *"continue to be"* . If the airport is not permitted by government legislation to take ultimate responsibility for the environmental consequences of its growth, then its environmental conscience is shackled, and SACL will fail in achieving these stated objectives.

7. Section 1.4 Planning Principles and Assumptions:

- (a) SACF Inc does not believe that Sydney Basin air-traffic can be catered for in an environmentally responsible way, having regard to the health and welfare of the citizens of Sydney without any additional airport at all . SACF Inc believes that it would be detrimental to the human environment to place any additional airport "in the Sydney Basin" , and that there should be a "new and/or replacement airport outside the Sydney basin" [dot point 1] ^{#4} .
- (b) SACF Inc notes with approval that there is no plan for new or lengthened runways [dot point 4].

8. Section 1.6 Environment Strategy:

Production of an updated environment strategy in 2004 which is entirely subservient to a commercially -driven "Master Plan" is putting the cart before the horse. For an inner-city airport such as Sydney (Kingsford Smith) with a historically well-established adverse environmental impact, the Master Plan should have been predicated on achievable environmental goals, not the present way round.

Sydney Airport Corporation should be required to resubmit its Master Plan after an achievable and socially acceptable set of environmental goals have been developed and formulated which put the human health and welfare of Sydney first , including the effects of downstream aircraft noise and air pollution. It is submitted that these two aspects cannot be divorced from the airport's commercial growth.

9. Section 1.6 Statutory Requirements -Airports Act:

The Corporation recites that the plan must *"include forecasts relating to noise exposure levels and the "ALC's" plans following consultation, for managing aircraft noise intrusion above significant Australian [sic] Exposure Noise Forecast (ANEF) levels* [dot point 6]; and *"assess environmental issues and the ALC's plans for managing these issues."* [dot point 7].

Whilst the PDMP produces a purported series of ANEF contours for the year 2023 and compares these with calculated ANEF's for the year 2001 [Figure 16.5] , it provides no plans whatsoever for ameliorating or preventing noise intrusion above significant or conditionally acceptable ANEF levels, or evidence of having "assessed environmental issues and the ALC's plans for managing" them. Nor does it state what it considers to be "significant" ANEF levels. A further analysis of this problem is conducted in Paragraph 16 with reference to the Noise Distribution analysis submitted in Appendix "C"

⁴ "The Way Forward from Sydney's Airports Quagmire," SACF Inc July 1999.

10. Section 2.3 Background - "Second Sydney Airport":

The discussion is incomplete as there is no reference to alternative airport sites apart from Badgerys Creek and Richmond. Relevant important sites considered in the Kinhill-Stearnes 1985 EIS , which achieved higher human-impact environmental clearance than Badgerys Creek , and which with more modern transport systems are now potentially within 30 minutes of Sydney CBD include Wilton, and Darkes Forest.

11. Section 3.3 Government Operational Regulatory and Policy Frameworks- "Noise Sharing"

The environmental health and welfare impacts of Sydney Airport are being entrenched in the worst possible way by the failure of the so-called "noise share plan" [aka Long Term Operating Plan for Sydney (Kingsford Smith) Airport], ie LTOP.

As implemented to-date the LTOP *has utterly failed* in two of its most important and ministerially ordained goals:

- (a) *"maximum use is to be made of flightpaths over water and non-residential areas" and*
[Minister Sharp 20/3/1996] ;
- (b) *"that noise abatement procedures for runway selection be optimised to facilitate the equitable distribution of the noise generated by the Airport ..."*
[Minister Sharp 24/5/1996]

The latter (b) was summarised in the LTOP Summary report in the following terms :

- (c) *"Where it is not possible for flight paths to be over water, the objective is to operate the airport to ensure that the overflight of residential areas is minimised and that noise arising from such flights is fairly shared"*
[LTOP Summary Report Dec. 1996 , p. 10]

The full set of LTOP goals are not as stated in this section of the "Master Plan." The LTOP was hijacked early on from its original goals and movements never were and are not now proposed to be maximised over water, nor are flight paths designed to minimise noise over residential areas or to share the unavoidable overland noise over residents equitably . The use of Runway 34R for takeoffs to the north (even with acute right turns over the east) was a breach of the promise of one government by another not to use the new third runway for takeoffs to the north. Moreover, Noise Abatement Departure Protocols [NADP's - ICAO -A type] , ministerially directed for takeoffs over residential areas in August 1998 ^{#5} have not been implemented .

The hijacked goals of the defective LTOP as put in place embodied a directional movement target regime of 17% North, 55 % South 15% West and 13 % East ^{#6} . Although contradicting the principle of maximising movements over water, even these targets have not been achieved.

Moreover they cannot be achieved under this Master Plan judging from the SACL proposed target movement distribution for 2024 [Figure 16.1] which shows 31% movements north, 14 and 6% movement east and west , respectively, and a meagre 49% movements south [See Table 2 below] . In none of the LTOP planning was the Ministerial Directive to maximise movements over water considered seriously enough by the LTOP Task Force or by the government SACF to ensure that the original LTOP Modes 2 and 3, which have the capacity to enable as much as 85% movements over water , were retained in the Proponent Statement.

No comment is made on these failures to comply with the LTOP principles in the Preliminary Draft Master Plan . Given that the airport corporation is now the ultimate driver for commercial capacity maximisation at KSA, SACL must undertake to investigate and report as to why these important environmental goals have been rejected by Airservices Australia , or whoever the responsible architect of failure turns out to be. It is the moral if not statutory environmental duty of SACL to ensure that environmental impact minimisation targets are achieved by Airservices Australia, as SACL stands to benefit most from the commercial advantages it extracts at the expense of the Sydney community of residents.

⁵ Vaile - 28 August 1998 ; T159/98.

⁶ Sharp - 29 May 1997, TR 72/97

Moreover, the statement about LTOP having received "environmental clearance" is misleading. Senator Hill, the then Minister for the Environment, made his so-called clearance (*without* an Environmental Impact Statement) conditional on the achievement of strict monitoring and surveillance and in particular :

"noise insulation should be provided for households and institutions which will be affected through the implementation of the Long-term Operating Plan and fall within the criteria for financial assistance."

[Hill Media Release , 24 July 1997, 88/97]

What proposals does SACL have for the implementation and/or continuation of the provision of noise insulation for affected residences as the Noise contours spread inexorably further inland across residential Sydney? Now an independent corporation , can SACL continue to hide behind the veil of government tort immunity?

In June 2003 a detailed critique of the Long Term Operating Plan (Noise Share Plan) was presented by this organisation to the Community Jury Panel which considered the proposed "founding principle" for Sydney Airport's Master Plan. The presentation summary sheets for this encounter are attached as Appendix "A" to this Submission.

The substance of these presentations was as stated above, that for KSA to expand as proposed then movements (and especially the noisiest departures) must be maximised over Botany Bay. This can only be achieved without unacceptable environmental cost by full implementation of LTOP's original Modes 2 & 3. Noise must actually be minimised over residential areas both by minimising them in number and by implementing the former Ministerially mandated ICAO steep noise abatement departure protocols for takeoffs over residential areas. Noise regulations must be enacted under the Airservices Act (S 9(2)) which set an upper limit for any aircraft noise impact from flight paths over residential areas. (See also Air Safety Aspects of LTOP in this submission S. 14.2).

12. Sections 6.1 6.4 6.5 - Aviation Activity Forecasts

12.1 SACL Predicted Movement and Passenger Growth Rates:

Passengers: 4.3% per annum

Movements: 2.4% per annum

The assumption made that aviation movement and passenger throughputs will not recover from the "9/11" World Trade Centre effect may not be valid. The historic growth in passengers from 1992/93 to 1999/00 was 5.9 % per year for seven years. Including the Olympic year (2000/01) results in an annual average growth of around 7.35% for 8 years. There is no adequate justification for using the immediate post -"9/11" year as the starting point for the post "9/11" growth cycle [average growth ca. 4.58%] , nor any analysis which indicates whether or not the airport will have reached its ultimate capacity before 2023.

Similarly in relation to movements, the historic growth in movements from 1992/93 to 1999/00 was 3.0 % per year for seven years. Including the Olympic year (2000/01) results in an annual average growth of around 4.5% over 8 years. However, the annual average growth including 2001/02 [the "9/11" year] was only 0.95% over 9 years.

Department of Transport revised "whole of Sydney Basin" forecasts provided to PPK for the Badgerys Creek EIS to 2021-2 were for 480,000 +/- 60,000 movements , ie +/- 12.5% ^{# 7} . The corresponding passenger movements were stated to be 49.1 million. However, this Draft Master Plan provides no indication of the expected tolerance on its growth predictions . The consequences of any such variation must be shown in terms of the environmental and health and welfare and noise insulation cost for affected Sydney residents (See ANEF -cost Para. 16, below) .

There appears little justification for including what may be a totally aberrant year as the reference point from which to predict growth to 2023. The "Master Plan" admits a Bureau of Transport and Regional Economics calculation that Australia -wide domestic air travel grew at a rate of 5.7% per annum over fifteen years to 2000/01 (S. 6.4, p. 46). SACL must therefore justify why its growth projections are so much less. Both passenger and movement growth rates are in excess of the value used by SACL to predict its 2023 position, unless the nine (9) year average to "9/11" is used as the commencing point (ie . 4.58% passengers).

⁷ Environmental Impact Statement (1999) , Second Sydney Airport, Supplement to Draft Vol. 3, Chapt 4.3.3, p. 4-5, DOTRS July 1998, PPK

Given that Extra Large Wide Bodied jets - the "New Large Aircraft or "NLA's " (See. S. 7.6 of PDMP) - will not come into service until at least 2006, and the existing fleet range is not going to disappear overnight, it will be erroneous to employ their passenger capacity for the entire projection to 2023. In any event the predicted capacity of an A340 is between 550 -650 ^{# 8}. This range is only 6.6 - 26% greater than the largest capacity B747 available today ^{# 9}. The questionable nature of the assumptions behind the targets is highlighted by comparison with contemporary world airport passenger / movement statistics. These are listed in Table 1 of this submission with reference to some of the airports referred to in the PDMP Figure 6.1. As shown, the annualised ratio of passengers per movement varies widely [43 at Vancouver in 1999 - 164 at Hong Kong in 2001] .

Table 1 shows that airports currently operating with an annual passenger movement number comparable to that aspired to by the Sydney airport lessee company of around 65 million all currently exceed the Sydney 2023 predicted

TABLE 1 - AIRPORT MOVEMENTS BY AIRCRAFT , PASSENGERS & FREIGHT CA. 2001

AIRPORT	MOVEMENTS	PASSENGERS	FREIGHT	RATIOS	RATIOS	
	AIRCRAFT	MILLIONS	KILOTONNES	PASS/MOVT	FREIGHT Tonnes/movement	
				P/Mvt	Tonnes/Mvt	Notes
ATLANTA (OO)	915,454	80.2	894.5	87.61	0.98	#1
CHICAGO	909,530	67.5	1,414	74.21	1.55	#1
LOS ANGELES (01)	B738433	61.6	2,064	83.42	2.8	#2
LOS ANGELES (97)	781,492	60.1	2,064	76.9	2.64	#1
HEATHROW (99)	458,500	63	1,327	137.4	2.89	#1
FRANKFURT (01)	456,452	48.6	1,494	106.41	3.27	#1
PARIS (cdg) -97	402,713	35.3	954	87.73	2.37	#1
PARIS (orly) -96	251,234	27.4	246	108.94	0.98	#1
HONG KONG	197,000	32.5	2,070	164.97	10.51	#1
BANGKOK (00)	280,216	29.6	865	105.63	3.09	#1
NEW YORK (JFK)	292,367	29.4	1,466	100.56	5.01	#2
SINGAPORE (01)	179,359	28.1	1,637	156.61	9.13	#1
TOKYO (NARITA) -01	129,000	25.4	1,604	196.9	12.43	#2
SYDNEY -01	254,729	23.9	430	93.83	1.69	#3
MUNICH (01)	337,653	23.7	123.4	70.1	0.37	#2
BRUSSELS (00)	326,050	21.6	687	66.25	2.11	#1
MANCHESTER (00)	181,000	19.6	113	108.29	0.62	#1
MELBOURNE	187,400	16.8	356.5	89.65	1.9	#2
VANCOUVER (99)	367,249	15.8	290	43.02	0.79	#1
VANCOUVER (02)	296,626	15.1	235	50.91	0.79	#1
AVERAGES	397,123	36.26	1,017	100.47	3.3	
STANDARD DEVIATIONS	244,799.85	19.74	688.06	38.42	3.42	

#1 A-Z World Airports Online <http://www.azworldairports.com/index.htm>
#2 Individual Airport Data
#3 Sydney Airport Preliminary Draft Master Plan

⁸ Clayton, G. (1997) "Battle for the airways", New Scientist, 17 May, p. 43.

⁹ Janes Aircraft Recognition Guide (1995) Harper Collins, p. 235 - B747 Passenger Capacity 516.

aircraft movement rate of 412000 / annum. Such airports include Atlanta (915454 movements; 80.2 m passengers) , Chicago (909530 movements; 67.5 million passengers) , Los Angeles (738433 movements; 61.6 million passengers) and London Heathrow (458500 movements; 63 million passengers).

The major international hub of Tokyo -Narita already achieves passenger movement rates (28 million) comparable to those currently at KSA with significantly fewer aircraft, but without "new larger aircraft" . However, this may be because most of the aircraft at Narita are of the current high capacity wide body types. Airports such as Atlanta, Chicago and Los Angeles, which have a wide variety of aircraft types , show larger aircraft movement numbers for the same passenger throughput, than , say Heathrow, because of the wider variety of aircraft types (eg. General Aviation, Regional and Commuter) which use them . For example, when Military, General Aviation and Air Taxi traffic is subtracted from the Los Angeles figures (where this data is readily available) the number of large transport movements reduces to 524,014. This, however, is still much greater than that expected by the Sydney airport lessee company for comparable passenger movements in 2023.

The reported freight tonnages per movement vary widely, ie. from 0.37 (Munich) to 12.43 (Narita) tonnes/movement. The average tonnage per movement for the 20 airports listed is around 3.3 , which is about twice the current tonnage moved by Sydney [1.69 per movement].

This analysis suggests that the goals of Sydney Airport , with its landlocked status on all sides but one and, surrounded as it is by heavily populated residential areas on every other, seem over ambitious . Given the predominance of essentially domestic traffic at KSA, and the likelihood that the Australian population is unlikely to double in 20 years , the sought-for traffic growth may not materialise. If it does, however, or reach today's movement rates for Chicago and Los Angeles, Sydney's skies will be swamped and the already horrendous predictions of ANEF- creep and increased movement affectation in this PDMP (S. 16 , p. 114 Fig.s 16.1 -16.2) will be massively overtaken .

Similarly, the predicted movement of freight transport to and from KSA is limited due to the limited nature of its connecting road and rail corridors , every one of them thrombosed to stagnation during peak traffic hours, even after the construction of the M5- East. Without wholesale demolition of Sydney's residential hinterland it seems unlikely that the KSA will be able to achieve anything like the freight movement efficiency of 3.15 tonnes/ movement which is forecast in this PDMP [1297000 / 412000 = 3.15] . The lessee company must explain these plans before the Minister approves this PDMP.

This airport corporation makes no attempt to reconcile its ambitious targets with what is compatible with maintenance of "noise sharing" (ie LTOP) when that was projected in the LTOP proponents statement as being good only up to 360,000 movements . Indeed, there is good substantiated evidence for a slot-capacity practical capacity limit at Sydney (Kingsford Smith) Airport of around 353, 000 movements. ^{# 10} If this is true, the SACL will need to rethink its return on investment calculations, but this does not reduce the environmental danger of them being permitted to test the limits.

12.2 2020-23 "Busy Day" Forecast Section 6.6 - (Fig. 6.6, p. 48)

No measure is provided of what the experience of 80 movements per hour for between five and six hours at a time would be like for hapless residents under the flight paths. There is an obligation under S. 71(2) (e) to (f) of the Act to highlight the airport company's plans for amelioration and prevention of such environmental effects, although none are stated anywhere in this defective "master plan".

The environmental impact of the resulting traffic increase (shown in Table 2, below) for the residential hinterland of Sydney will be horrendous. Most of this will consist of aircraft flying over existing residential areas which will become progressively "newly-affected" as the "Plan" advances and the environmental impact liability consequences of the proposal must be honestly and accurately analysed and addressed by this airport lessee corporation for it to comply with s 71(2) of the Act.

¹⁰ G. Nero and J. Black (2000) A critical examination of an airport noise and an aircraft noise charge, Transportation Research Part D5 , 433-461, at 441, Table 9

Practically speaking the claim on PDMP p. 48 that Sydney Airport can accommodate all likely growth for 20 years is not supported by the facts. The 'Busy Day' (18th busiest day of 2023-4) is at the absolute limit of the legislative cap of 80 movements per hour. Aircraft takeoffs and landings are predicted to operate continuously from before 8am right through to noon on (PDMP Figure 6.6).

Queuing theory shows that even with well-regulated slot allocations, there will be both terminal and arrival delays and the "distributions" in fact represent a notional rather than absolute cap. This is because the normal problems that occur every day or month will cause unacceptable delays due to the terminal- and in-flight- queuing space being insufficient for more than twenty planes to maintain the cap over the continuous 4 hour period. Planes simply cannot routinely queue for an hour to gain access to a runway.

The cost of *insufficient* airport capacity is about ten times the cost of having a little extra capacity which is underutilised. Such planning is normally done with scenarios which reflect about $\frac{3}{4}$ of a standard deviation above the mean. In some cases this is done by having high, low and mean volume projections, and doing the capacity planning for the higher end of the range of estimates. All that the PDMP shows is that, if airports ran like clockwork, AND aircraft flew on railway lines, AND growth in aviation is only very moderate over the coming decades, AND airlines all move to larger capacity planes, then KSA would be precisely choking in 20 years.

If aviation grows even slightly faster than predicted, the airlines do not upgrade uniformly to larger planes or there is a day busier than the 95% percentile, the one additional plane approaching the airport at 8am will cause a backlog through to noon, and any hiccup in operations will cause waiting times to blow out to such an extent that planes will have to be diverted to Canberra to land before running out of fuel.

It has already been observed that "movement cap" exceedances can occur due to mis-scheduling of long-haul arrivals due to delays in the early morning period which result in carry-overs to subsequent slot hours. These exceedances resulted in "actual movements" reaching as much as 90 /hour between March and May 2001^{#11}. Unless accommodated, such carry-overs cause resulting queuing problems in later hours which result in later exceedances etc. With the ambitious slot-scheduling forecast for 2023, it is possible to foresee areal log-jams being created of unprecedented proportions.

13 Land Use Zoning Plan - S. 13:

13.1 Infrastructure Crowding PP. 87 -90:

There is too much "Crowding In" of the runways, as if every square metre must generate a return. Yet a fundamental safety mantra for airports is that planes overshooting runways should not encounter any significant obstacles, and even veering off a runway should not create a major crash opportunity.

The Southern Cross Drive overpass already encroaches the safety zone for the East-West runway's eastern end. The proposed "mixed-use" business areas Mixed Uses 1 & 2 also increase the crash accident damage risk for third parties and business operators, not to mention the occupants of overrunning aircraft at the north end of runway 16L/34R. The airport lessee company's proposal to abandon such 'safety-first' principles in favour of 'commerce first' priorities, will be to the detriment of safety when measured over any reasonable period.

Similarly, the building of a new high-density freight facility right on the runway end of the main long north-south runway 16R/34L shows a gross lack of concern for safety. If even an existing long haul plane failed to gain altitude, instead of finding open land immediately across the Alexandria canal, it will in future crash into a multi-storey freight complex built on land which was previously clear because it is right under final approach and just after runway clearance on takeoff.

Moreover, it is simply hypocritical for SACF to seek to build in such super-high ANEF zones, when all manner of neighbours for kilometres around are prevented from building the types of structures they would like to build on their land, simply because of the airport's activities. The airport lessee company highlights that it generally does not need to meet state planning laws, due to the Airports Act [PDMP S. 13.1], but SACF is required to comply with normal EP+A Act and Council requirements in respect of its proposals on the privately-owned land north of the canal.

¹¹ Government SACF Minutes, 15/6/2001

Accordingly, Marrickville Council would be advised to refuse permission for this freight facility to be located right on the runway end, where other buildings are not allowed. There is a 'duty of care' that both SACL and the Council owe to SACL's employees, SACL's freight lessees' employees, contractors etc, as well as invitees who will attend as freight forwarders, truck drivers, tradespeople, customs staff, quarantine staff, art gallery staff, and all the other manner of people who presently visit the freight facility.

None of these people ever agreed to take on additional risks from death through to deafness due to relocation of the SACL freight facility to the very end of the longest runway. Given the projected growth in air traffic and ANEF for the site this would be madness. Marrickville Councils' role as the consent authority for any such development should be to protect the public interest, per the NSW EP+A act. The existing freight facility is a mix of commercial offices with light industrial use (ie no heavy forges or stamping equipment) - clearly the 120dB+ events of 747s taking off just metres over workers and their invitees will be the noisiest events they will encounter in the working day creating a potential Workcover issue.

So the new freight facility should not be allowed at the runway end. Indeed, the point is made well on PDMP p116 that AS 2021 -2000 states: *"In no case should new development take place in greenfield sites deemed unacceptable because such development may impact airport operations."*

Further, the above deals only with the noise aspects. The fact that 747s taking off just metres above the heads of such workers and guests also means that this site would be the most dangerous for airborne hydrocarbons, including NOx and SOx with 5% of Sydney Basin's generation of such substances. It would be grossly irresponsible to permit people to work or visit for work purposes a site just metres below flying 'kerosene sprinklers' because of its effect on human health.

It is well recognised that aircraft exhaust include toxic byproducts and known carcinogens. Thus if the freight centre construction is permitted, the airport lessee company and Marrickville Council might be subject to expensive law suits for one bad planning decision.

Indeed, the very fact that SACL proposes a expanded public freight facility on the very runway end, foreshadows the nemesis of the Master Plan. It shows that the existing airport cannot handle the freight requirements up to 3.15 tonnes/ movement planned by SACL through 2023.

13.2 Airspace Protection and Air Safety in General - Section 14, p. 98 :

The PDMP Section 14 deals with safety aspects of airspace protection from obstacles surrounding Sydney Airport. However, it fails to point out that CASA has never carried out the Safety Audit required in the LTOP Proponent Statement #12. Both the Design and the Audit of the LTOP were carried out solely by Airservices Australia, and this was heavily influenced in execution by community pressures. In August 1998 the Bureau of Air Safety Investigation [BASI] criticised the high dependence of LTOP on crossing low-altitude, minimal-separation arrival and departure flight paths #13.

The BASI investigation revealed safety deficiencies due to "separation assurance" problems which it claimed were caused by defective management of change, and the rate and complexity of change since 1994. Three such **"separation occurrences"** #14 were reported before the investigation and a further three such occurrences took place while it was being carried out.

BASI emphasises the higher level of controller skills required for a "highly structured" airspace environment (such as LTOP) compared with operating in straight-on parallel modes #15. It said more controller activity is required to keep aircraft within their respective departure and arrival strata when these cross frequently than when departures can be instructed to climb to cruising altitude as soon as possible, and arrivals can go straight to terminus. It concluded that putting the onus entirely on **".....[air traffic controller management practices] ... in order to effectively**

¹² LTOP Proponents Statement Para 3.6, p. 3-32.

¹³ BASI Investigation Report B98/90, August 1998.

¹⁴ A "Separation Occurrence" is when two aircraft approach closer than 1000 ft vertically or 3NM horizontally.

¹⁵ BASI Investigation Report B98/90, August 1998, S. 1.3.5 & 1.4.3.

reduce the level of risk of an identified hazard to an acceptable level, are not considered to be acceptable mitigation strategies in the light of known human performance limitations." ^{# 16} .

Although Airservices claims to have resolved these problems through subsequent organisational change, the inherent hazard of the low-altitude, low-separation crossing flight paths still remains. This is because the originally proposed LTOP "high and wide" , and oceanic-corridor arrival-routes, designed to avoid collision possibilities between departing and arriving aircraft crossing Sydney, have not been implemented ^{# 17} .

Given that Sydney Airport is the largest airport for which CASA has responsibility , one cannot but suspect that CASA has not undertaken the audit promised with LTOP, because its safety shortcomings would be highlighted by a review. The resulting inherent conflict of interest in the present Airservices role as both designer and auditor of the plan is not what the proponent statement envisaged, nor what the community was promised.

This failure to perform its required function means Australia is contravening its international obligations under The Chicago Convention, whereby supposedly independent bodies for air safety are required to prevent the government of the day compromising safety. Apart from the noise impact question being worsened by low-flying, frequently-crossing flight tracks across the Sydney Basin, **this is an important safety issue which must be resolved** as soon as possible. The airport lessee company standing to benefit from air traffic growth at Sydney Airport is now on notice that its plan to maintain the status quo of the LTOP flight paths may also be unsafe.

14. Section 16.1 Sydney Airport Environment Management - Environment Strategy

As stated in Para. 4 , above, the "Sydney Airport Environment Strategy" ^{# 18} makes no undertaking whatsoever for the "management" (whatever that may mean) of downstream aircraft noise impacts. A major defect of the Strategy, highlighted by the Schiphol Benchmarking Study [Appendix "D" of "Strategy"], was the failure of the airport environmental regulatory system. This failure results from the fact that the regulatory system does not make the airport lessee corporation [SACL] , the direct beneficiary of the promoted increased traffic flows, directly responsible for the human health and welfare consequences of the environmental impacts of increased aircraft movements over neighbouring residential zones. Instead it is Airservices Australia which is given this responsibility by the Airservices Act Cth. (1995)^{# 19} . This creates a fundamental break in the chain of responsibility.

When Sydney Airport prepared its "Environment Strategy" in 1998-9, it employed "The Schiphol Group" , a subsidiary of Amsterdam Airport at Schiphol, to advise what was required to achieve "World's Best Practice" in environmental management. The Schiphol report responded in the following terms ^{# 20} :

"Achieving this will require a very progressive and sometimes nearly aggressive approach to environmental issues. Very active and in some cases even not shying from taking the lead to further develop "the world best practices" in environmental management. "

"Among others this would require at least a formal commitment as an airport to act as a good neighbour and to undertake every reasonable and practicable action to prevent or minimise affecting the environmental quality in populated areas near the airport. This is not yet clearly stated as an important aim."

"An integrated approach and a total-airport environmental management are essential to achieve "worlds best practices" and the "best environment management". However, the impression is that due to existing legislation, a really integrated approach and a total environment management addressing all issues in a coherent way cannot be achieved at this moment. "

"For instance the environmental impact of aircraft operations outside the airport boundaries (like noise, air pollution, third party safety risks etc.) cannot be addressed in this proposed Environment Strategy. Still, experience at almost all major airports shows that it is outside the airport boundaries where the biggest environmental

¹⁶ BASI Investigation Report B98/90, August 1998, S. 2.4.

¹⁷ LTOP Summary Report , Dec. 1996, p. 89-90.

¹⁸ Henceforth "Strategy"

¹⁹ Airservices Act Cth. (1995) S. 9(2); s. 8(1) (d) .

²⁰ Sydney Airport "Environment Strategy" , Nov. 1999, Appendix "D" "Amsterdam Airport Schiphol Benchmarking Study".

problems lie and will need to be solved or controlled. These must be addressed in a coherent way together with the "inner-airport" environment issues if good neighbourhood and support is to be continued in the future. "

"Therefore either changing this restrictive legislation should be set as an additional prime target and an essential condition to achieve the ambitious goal of becoming "the best"....."

[Author's emphases]

The Schiphol Benchmark went on to say:

"The draft Environment Strategy reveals a rather formal approach, which seems to aim mainly at complying with "formal obligations" by establishing systems and procedures, and gathering relevant information and far less at achieving specific results. " and

"..... This is, illustrated [by] the prime objectives of Sydney Airport's environmental strategy [being] are not to prevent or minimise pollution or noise, but to establish systems to "manage this". In practice such management systems should be just essential tools to achieve the environmental targets. Such environmental targets should be specified and where possible quantified. "

[Author's emphases]

and , later:

"Yet some aspects of the environment outside the airport boundaries, which may be far more important for the environmental quality for the neighbouring population, are not well addressed. It is not unlikely that surrounding communities would be interested in the future prospects and possible effects in their neighbourhood of subjects like:

- operational aircraft noise
- air pollution due to aircraft
- external safety risks for third parties
-etc
- recognition and compensation of environmental damage
- handling of complaints

"These subjects would need to be addressed equally well if one aims at becoming the airport with "the worlds best environment management system".

[Author's emphases]

The above illustrates the approach of one overseas airport group to environmental management. It radically departs from that permitted by the legislation governing airports in Australia. Schiphol earns an estimated 2% of Dutch GDP, yet Schiphol Amsterdam is an airport which is voluntarily restricting its potential growth for the sake of the surrounding community^{#21}

Sydney Airport Corporation must be required to put forward options for workable solutions to this important criticism . In its Final Environment Strategy Document (pre-sale) the then government SACL promised as follows:

"Sydney Airport acknowledges the need to further address aircraft impacts external to the Airport. This challenging task will be undertaken during the preparation of Sydney Airport Master Plan. This Environment Strategy represents an important first step to improving environmental management at the Airport."

[Author's emphases]

Instead of a fulfilment of this promise, within the context of this Master Plan, there is no reference to the Schiphol recommendations, nor to the vexed issue of responsibility for downstream aircraft environmental impacts, or any responsibility whatsoever!

Instead the "Strategy" is summarised as if dealing only with consequences of airport operations within the airport boundaries [Para 16.1] . There is a facile statement that :

"The environmental issues that may arise during the planning period include:

- *Impacts on the noise environment from increased aircraft movements*
- *Air emissions from aircraft operations and ground transport*
- *..... [other listed ground related operations] [S. 16.2]*

[Author's emphases]

²¹

Echikson, W. (1997) "An Airport may get its wings clipped", Business Week, Sept. 29, p. 4.

15. Section 16.4 Sydney Airport Environment Management - Aircraft Noise

15.1 Regulatory Background:

The requirements for the Master Plan in connection with Aircraft noise are specified in Section 71 (2) (d) to (g) of Part 5 Division 3 of the Airports Act (1996) Cth., ie:

"(d) forecasts relating to noise exposure levels; and

(e) the airport-lessee company's plans, developed following consultations with the airlines that use the airport and local government bodies in the vicinity of the airport, for managing aircraft noise intrusion in areas forecast to be subject to exposure above the significant ANEF levels; and

(f) the airport-lessee company's assessment of environmental issues that might reasonably be expected to be associated with the implementation of the plan; and

(g) the airport-lessee company's plans for dealing with the environmental issues mentioned in paragraph (f) (including plans for ameliorating or preventing environmental impacts); ..." [S. 71(2) (d) -(g) AA Act 96]

[Author's emphases]

15.2 Introduction:

The PDMP first repeats the principles said to underlie the Noise Sharing Flight Paths and the statement is made that :

"SACL does not propose new or altered flight paths in the Master Plan, and is committed to upholding the principles of "noise sharing."

It then goes on to list these principles as summarised in the LTOP Reports ^{# 22} and states that "noise sharing " implementation is monitored by the *Sydney Airport Community Forum* (government SACF) and an implementation and Monitoring Committee (IMC) and describes the history of LTOP development since July 1996. It further states, in the context of Flight Path Management , that these are managed by Airservices Australia and the Sydney Airport Community Forum (government SACF).

Under the heading "Flight Path Management" it claims that *"much work has been done by the aviation industry over recent decades to reduce the impact of aircraft noise"*, which at Sydney includes : "implementing noise sharing flight paths"; "property acquisition"; "providing acoustic insulation"; "establishing controls on the types of aircraft using the airport" and control of movements per hour and hours of operation.

It then goes on to describe the Sydney noise monitoring system (which takes place mainly on the old north south axis), permissible aircraft types and insulation. It has not considered whether this is a success.

This is fine as far as it goes, but the airport corporation displays "no ownership" and reveals no "assessment" of the environmental impacts , management , amelioration and prevention plans as required by the Airports Act, which S. 71(2) states is "the airport lessee company's" responsibility.

The primary means put in place by Government in 1996-97 for the ameliorating of aircraft noise was LTOP . Whilst laudable in intent ("putting people first" and "fair share noise") , it has already been stated [para. 11, above] that the LTOP "Noise Share" plan has manifestly failed to conform to any of the Minister's original principal directives, viz:

- Maximising movements over water;
- Minimising and fairly sharing the unavoidable overland noise; and
- Implementing ICAO-A noise abatement protocols for takeoffs over residents.

As stated earlier (para. 11, above) , the LTOP has been hijacked for unstated reasons and deflected from its originally -stated purpose of maximising movements over water.

²²

See eg. LTOP Summary Report p. 10

If the airport lessee company had properly addressed these crucial primary issues it would not have made the facile statement that it does not propose any new or altered flight paths in PDMP S. 16.4, because it would have recognised that the present situation is environmentally unacceptable, unsatisfactory and unsafe.

The identification of flight path changes needed to conform to the original LTOP principles is central to addressing the current environmental and safety problems. Flight path changes are needed which :

- (a) **Maximise movements over water and non-residential land;**
- (b) **Minimise noise over residential areas where overflight is absolutely necessary;**
- (c) **More fairly share the inevitable (minimised) noise distribution;**
- (d) **Implement ICAO Noise Abatement Departure Protocols for all residential takeoffs &**
- (e) **(at minimum) comply with the hijacked LTOP movement targets of 17% north, 55% south, 13% east & 15% west**

In fact the Minister's actual prescription was to *maximise movements over water*. This has never been seriously attempted in the "fair share" noise plan.

SACL has not addressed these crucial and important defects in the LTOP. Neither has Airservices Australia, the government SACF or the IMC. This airport corporation appears to be relying entirely on third parties and committees for the solution to these problems, when under the Master Plan specification it is the *"airport lessee company's"* responsibility to :

- (i) *assess the environmental issues flowing from implementation of the (master) plan [S. 71(2)(f);* [paraphrasing]
- &
- (ii) *deal with these assessed environmental issues in such a way as to ameliorate or prevent their impacts [S. 71(2)(g)]*

SACL is now the primary commercial driver for airport growth. It should therefore assume the primary responsibility for community friendly environmental amelioration and prevention. It is insufficient for it to set out its long term annual movement targets (68.3 m passengers, 412,000 aircraft and 1.3 m tonnes of freight by 2023) without putting forward any means of ameliorating and prevent adverse human impacts which will inevitably result .

15.3 Insulation :

Apart from flight path changes, noise insulation is one method of ameliorating noise impacts from aircraft operations.

The statement at p. 115 that the Sydney Airport Noise Amelioration Program provides a mechanism for the insulation of homes ... etc., is misleading and should be either removed or properly and accurately explained.

The noise insulation program [Sydney Airport Noise Insulation Program - or SANIP] for original third runway impacts had not been completed by June 2001, and was then expected to be completed by June 2002 ^{#23}. Since that time it has either been wound up, and has never applied to newly affected homes under the "noise sharing" LTOP flight paths ^{#24 #25}.

What the Master Planning process demands is evidence of the *"airport lessee company's"* plans for continuing amelioration and prevention. As will be seen below, this will be more significant than ever before as LTOP continues its inexorable plague-like spread across Sydney's most heavily populated residential suburbs in the manner projected by this airport company for 2023 [Figs 16.1 -16.5].

The taxpayer, residents and communities affected by aircraft noise of Sydney want to know who is going to take responsibility for what is generally accepted (even by the Government SACF) to be an inadequate noise insulation program ^{#26}. This SACL statement ignores the fact that even with noise insulation there are extensive reports as to it being unworkable and of non-compliance with AS2021-2000. The Australian National Audit Office found in

²³ Minutes, Government SACF, 15/6/2001;

²⁴ House of Representatives Notice Paper No. 41, 16/9/2002, Q 667, p. 1208

²⁵ Minutes, Government SACF, 31/3/2003, AI 6

²⁶ Minutes, Government SACF, 7/7/2000; ibid 31/3/2003 .

1998 that the lack of any quantifiable noise reduction target for residential insulation made it difficult for the program management to assess its own effectiveness and hold contractors accountable for the achievement of noise reduction standards ^{# 27} .

The conditions requiring noise insulation for building siting and construction near Airports are specified in Australian Standard AS 2021-2000 ^{# 28} . This is the Standard referenced in the Airports Act (1996) . It lays down the principles of Architectural Acoustics which define the conditions for civilised living and/or working in various types of premises near airports.

AS 2021-2000 (formerly 2021-1994) states that noise insulation is desirable if the noise levels in residential relaxing and sleeping areas exceed 50- dB(A) ^{# 29} . It also defines the Australian Noise Exposure Forecast (ANEF) system which is employed as a so-called "land-planning" tool around Australia's airports. The ANEF parameter is obtained mathematically by summing all predicted noise exposures due to aircraft over a year ^{# 30} .

In the PDMP the "*airport lessee company*" (SACL) states that insulation is the responsibility of the Federal Government and further recites that noise insulation is "*administered by the Commonwealth Government*" . It states that funds are raised from a noise levy applied to passenger tickets and that "more than \$400 million has been spent on this program."

However, for the Master Plan , the Airports Act requires a statement as to what "the airport lessee company" intends to do about impact amelioration and prevention [S. 71(2) (g)]. Instead we are presented with SACL's expectation that Sydney Airport will be given a free ride at the flying -public and taxpayer's expense to ride roughshod over the environmental interests of the ground-bound public, whose homes all across Sydney increasingly lie under the noisiest and lowest departure flight path ceiling of any since Sydney Airport began !

Furthermore, the airport company does not advise that very few of the around 13000 homes originally recommended for insulation have ever been insulated . The (former Third Runway) Community Advisory Committee, NSW Environment Protection Agency and the Commonwealth Environment Protection Agency originally recommended noise insulation for homes in areas within the ANEF 25 -contour , on justifiable environmental grounds ^{# 31} . Such homes are rated "*unacceptable*" for human habitation without acoustic treatment by Australian Standard AS 2021-2000 .

However, "Significant ANEF levels" are defined in the Airports Act (1996) as *ANEF's greater than 30* [S. 5 -Definitions] . What SACL does not remind the Minister is that of the original 3500 eligible homes in the Third Runway ANEF 30 zone only around 1200 and a few churches and schools have ever been offered insulation, and then only after significant bureaucratic delays ^{# 32} . These delays were such that for many people the insulation came too late and many people were forced (because of the unbearable noise nuisance) to leave their homes ^{# 33} .

Australian Standard (AS 2021-2000) ranks an ANEF level of 30 as very definitely "*unacceptable*" for residential home construction and even *unacceptable* for "public buildings". Yet it is only with reference to "*significant ANEF's*" (ie above 30) that the airport lessee company need be concerned for the purposes of S. 71(2) (e) .

However, S. 71(2) (f) and (g) impose a wider spectrum of environmental impact responsibility on the airport lessee company . Without qualification, it is required to provide an assessment of environmental issues that might reasonably be expected to be associated with implementation of the plan, and put forward plans for dealing with , ameliorating and preventing them. Arguably S. 71(2) (f) and (g) will also apply to noise impact ANEFs of less than

²⁷ Audit Report - Sydney Airport Noise Amelioration Program, The Auditor-General Audit Report No.17 Department of Transport & Regional Development 1998 ISSN 1036-7632 ; ISBN 0 644 39016 6

²⁸ Acoustics - Aircraft noise Intrusion- Building siting and construction, AS2021-2000
²⁹ ibid Table 3.3

³⁰ Acoustics - Aircraft Noise Intrusion- Building siting and construction, AS2021-2000, Appendix B

³¹ Fitzgerald, P. (1998) The Sydney Airport Fiasco, Hale and Iremonger, p. 134-135.

³² Fitzgerald, P. (1998) The Sydney Airport Fiasco, Hale and Iremonger, p. 134-135.

³³ Fitzgerald, P. (1998) The Sydney Airport Fiasco, Hale and Iremonger, p. 134-145.

the statutory "significant level" of 30 , but which are still of significant objective nuisance value to residents in their homes.

Basing its conclusion on extensive community noise studies carried out in the early eighties ^{# 34}, AS 2021-2000 states that up to 45% of people will be moderately to severely affected by aircraft noise for ANEFs above only 20. At 15 ANEF around 35% of people are "moderately to severely affected" ^{# 35}. For people in newly affected areas the Second Sydney Airport EIS applied a noise bonus of 8 dB(A) to this bringing the notional tolerable level (45% moderately - severely affected) down to only 12 ^{# 36} ANEF .

The Airport Lessee Company should therefore detail its proposals for the implementation and/or continuation of the provision of noise insulation for affected residences as the Noise contours spread inexorably further inland across residential Sydney, for whom successive previous governments have denied liability .

At common law a public corporation such as the Airport Lessee Company would normally be liable for damages in nuisance just like any other public corporation manufacturing toxic and noxious substances, eg tobacco, or creating hearing loss in people, as are employers under Workcover provisions in NSW. SACL needs to address these issues in its Master Plan. If SACL has received government indemnity for this liability under the terms of its lease, then that should be stated.

16. Section 16.5 Sydney Airport Environment Management - Noise Descriptors & ANEF

16.1 "Noise Descriptors" -Movements & Percentages:

The PDMP Figure 16.1 shows the "average daily movements" for each of the LTOP flight path spread zones employed today . Appendix "B" of this submission shows what it was like in 2001 ^{# 37} . Using "average days" in such presentations has the same problem for which the ANEF system was criticised by the Senate Select Committee Enquiry into the Third Runway EIS ^{# 38} . It underestimates the effective impacts during actual operational periods. It should be made clear that an "average day" does not represent a "typical day of affectation" when the movements per day which can be from 2 to 4 times the levels indicated depending on runway selection options available the time.

Figure 16.1 merely shows what is stated in paragraph 11 above, namely: This Airport Lessee Company has no intention to comply with the LTOP Movement targets of 17% north, 55% south , 15% east & 13% west. The movement proportions projected for 2023 show 31% north, 49% south, 6% west and 14% east. This is far from the promised targets of the "fair share" noise plan, yet this airport lessee company provides no comment justification or apology for this whatsoever!

Table 2 compares the projected movements and percentage movements for 2023 with those for the year 2000.

PDMP Figure 16.1 also illustrates that the original goal of maximising movements over water has not been achieved, and cannot be achieved without some change to flight path availabilities at KSA. Although Airservices Australia is responsible for this debacle (perhaps coached on by sectional parochial /political interests) , the public has a right to expect the 20 March 1996 Ministerial directive to be carried out!

After all maximising movements over water also minimises potential cost from the need for noise insulation. It also minimises crash risk damage in the manner proposed in the LTOP Proponent Statement, but long since forgotten ^{# 39}!

³⁴ National Acoustic Laboratories Report No. 88, Hede J. & Bullen R. (1982).

³⁵ Acoustics - Aircraft noise Intrusion- Building siting and construction, AS2021-2000, Fig. B1.

³⁶ PPK DRAFT EIS Second Sydney Airport S. 11.3.2; Supplementary EIS Chapt. 8.3.3

³⁷ Sydney Airport Average Daily Movements 1/1/2000 - 31/1/2001, DOTARs Statistics distributed by Stolzznow Research at Master Plan Community Reps Briefings, Nov. 2002.

³⁸ "Falling on Deaf Ears" - November 1995 - The Parer Committee Report, ISBN 0 642 24416 2, AGPS

³⁹ DOT&RS Proponents Statement Para 3.6 at page 3-32.

TABLE 2 COMPARISON OF MOVEMENTS & PERCENTAGES 2000 AND 2023

			MOVEMENTS	MOVEMENTS	
<i>Flightpath</i>	<i>Direction Description</i>	<i>Arrivals/ Dep or Both</i>	2000 Actual	2023 Forecast	% Increase
A (North)	Sydenham (B+C)	Both	126 (26%)	284 (31%)	125%
B (NW)	Burwood & NW	Dep	55 (11%)	103 (11%)	87%
C (North)	Hunters Hill & N	Arrivals	72 (15%)	181 (20%)	151%
D (NE)	Double Bay	Dep	28 (6%)	70 (8%)	150%
E (East)	Coogee	Both	17 (3%)	26 (3%)	53%
F (East)	Maroubra	Dep	32 (7%)	28 (3%)	-13%
G (South)	La Perouse	Dep	26 (5%)	56 (6%)	115%
H (South)	Kurnell	Arrivals	140 (29%)	233 (26%)	66%
I (South)	Wanda	Dep	87 (18%)	150 (17%)	72%
J (West)	Rockdale	Both	33 (7%)	56 (6%)	70%
	Total Movements		616	1,187	93%

Table 3 shows the approach to the LTOP Movement Targets achieved since 1997, with projection to 2023 from PDMP Fig. 16.1

TABLE 3 APPROACH TO LTOP MOVEMENT TARGETS

	NORTH	SOUTH	EAST	WEST
LTOP "TARGETS"	17%	55%	13%	15%
2000	26%	52%	16%	7%
2023	31%	49%	14%	6%

Note that instead of approaching the "targets" more closely as might be expected from "fine tuning" of a professionally-designed successful "noise share" system, the disparity between targets and achievements becomes even greater - especially over the north - where the movement percentage increases from 26 % (year 2000) to 31% (2023) against a "target" of only 17%.

Similarly percentage movements for the "South", which are almost entirely over water and notably affect few residents, decreases from 52% (2000) to 49% (2023) when the LTOP "target" was 55%. Incidentally 55% has never been achieved in the history of this LTOP, yet all the while the movement targets north, west and east have been exceeded.

It is this submission that had an environmentally responsible Airport Lessee Company properly carried out its assessment and planning functions under S. 71 (2) of the Act it would have highlighted and explained these differences and considered what could be done about improving the achievement of the "noise share" targets, at least.

Preferably, had it been particularly perspicacious, it might have noted that the obvious and most environmentally suitable solution for Sydney was, as the Minister first directed, ie. to maximise movements over water. **Why is this so?**

16.2 "Noise Descriptors" -N70 Distributions PDMP S. 16.5; Fig. 16.3

These are presented in PDMP Figure 16.3 without explanation. For this complex science of aircraft impact acoustics such cursory treatment is highly misleading, especially when presented without justification.

Following an all too brief introduction about "the need to provide meaningful noise information", the complex data of Figure 16.1 -3, is briefly summarised in merely six lines of p. 115 (S. 16.5), without specific reference to the N70 diagram in Figure 16.3) thus :

"Hence, noise descriptors in addition to those required by regulation, have been provided in this Master Plan. These represent predicted aircraft noise exposure in a way that allows an individual to assess on an objective basis how they might be affected by forecast aircraft noise." [PDMP p. 115]

The N70 parameter was first used in the LTOP Reports (Dec. 1996) and the Badgerys Creek EIS [PPK 1997-98], but there it was used with some explanation of the significance of the parameter in terms of how individual homes might be affected by the resulting exposure. Why does this Airport Lessee Company have no time to stop and provide this information, which is not even referred to in the Master Plan document?

The Airport Company should be required to include a sufficiently detailed explanation to enable the lay person unfamiliar with acoustic terminology, or the architectural acoustic standard (AS2021-2000), to understand the information provided. As presented, Figure 16.3 is misleading. Many people taking only a cursory look might assume that the only noise people were subjected to within the contours was at the level of 70 dB(A).

This is not the case, of course. The fact is that any level above 70 dB(A) may occur within each contour. In a recent three month survey on an inner west property by Airservices Australia ^{#40}, no jet aircraft produced noise levels below 70db(A). The majority of 747 -400's departing over that location produced an average maximum noise of 80.3 dB(A) +/- 4.1 (Standard Deviation) ^{#41}. This means that 95% of the data fall within the range of 72.1 - 88.5 dB(A) and 99% within the 68 - 92.6 dB(A).

The N70 is not an officially accepted means of portraying sound level affectation in connection with aircraft noise in architectural acoustic standards. The explanation in the LTOP Reports for the use of 70 dB(A) as the criterion in such charts is as follows:

"The 70 dB(A) contour was chosen because it represents an external sound level which should cause no difficulty with reliable communication from radio, TV, or conversational speech in a typical room with windows open. It is also the level which equates with windows open to an indoor sound level of 60 dB(A), the indoor design sound level which when heard inside a normal domestic living room by the average listener will not be judged intrusive or annoying (it then cites AS2021-1994). It also equates, when the windows are closed to an indoor level of about 45 to 50 dB(A) which does not exceed the indoor design sound level considered acceptable for relaxing or sleeping areas (again cites AS 2021-1994)."

[LTOP Summary Report pp 91-92]

Unfortunately, this statement is only accurate for a series of external sound levels of exactly 70 dB(A). In practice, the N70 contour encloses a region within which the levels may be at any level above and, as shown in the inner west example cited above, 49.5 % of the 747-400 levels at this location (6 km from the end of runway 34L, and ca. 8.5 km from takeoff roll) would be between 80.3 and 92.6 dB(A) [Mean + 3 x SD]. This results in there being many occasions when speech will be drowned out and sleep or concentration would be disturbed by the resulting noise; and this area was not affected by aircraft noise before December 1997.

⁴⁰ At a residence in Summer Hill, near the 20 per day N70 contour boundary.

⁴¹ Environment Services Branch Canberra, Report No. 1360, 30/7/2003, Table 2.

Moreover, the N70 contours grossly underestimate the frequency of exposure in a typical impact period, because of averaging over a typical year. With LTOP "noise sharing" this results in approximately 2 to 4 times the number per day in any actual "impact period" ^{#42} (ie when prevailing winds cause aircraft to be directed over that location).

Thus the use of the N70 can be highly misleading to the casual, lay observer. The stock-in-trade explanation for the application of N70 contours is misleading because only in few cases is the noise level actually less than or equal to 70dB(A), which would justify the explanation provided in the LTOP Proponent Statement and the BCA EIS.

If the airport lessee company proposes to continue with this representation for community noise levels, then it must be properly explained, with a statement of appropriate precautions to be applied in its use, and the expected impacts in "impact periods" (ie when aircraft are flying overhead).

The fact is that anywhere within an N70 contour boundary will experience aircraft noise exposures in excess of 70 dB(A). Notably, this airport lessee company proposes to extend the N70 (20) contour from Haberfield to Ermington in the north west (a distance of 10 kilometres), from Boronia Park to Gordon in the north (7.7 km).

This corresponds to as much as from 40 - 80 intrusions of at least 70 dB(A) per day in any impact period. In the immediate east the N70 bands retreat somewhat, while in the north east [Paddington/ Woollahra] the N70(20) band advances from Alexandria/Zetland to Point Piper.

With LTOP as currently managed most such flights occur in the very early morning or late evening hours, [long haul jets flying to Los Angeles and Tokyo via Parramatta and Kuringgai!]. Thus much of the represented disturbance will occur at sensitive hours.

A minor publishing problem with PDMP Figure 16.3 is the almost total invisibility of the coloured shaded contour boundaries for 2023, especially the lighter yellows and pinks. It should also be noted by the airport company that the N70 is not a system of community noise representation which has been adopted by Standards Australia.

16.3 "Noise Descriptors" ANEI/ ANEF Distributions - PDMP S. 16.5, Fig. 16.5:

In Figure 16.5 of PDMP Section 16.5, the Airport Lessee Company presents cumulative noise distribution charts for 2001 [ANEI] superimposed on those which will result from its projections for the airport in 2023 [ANEF]. The 20 ANEF zone moves out from the vicinity of Lewisham Hospital to beyond Croydon in the northwest, and in the north east it moves from near Mascot to Kensington, with somewhat lesser affectation in the west and east. In the immediate north [Bennelong] the 20 ANEF zone shifts north from Drummoyne to Boronia Park (north of the Lane Cove River!). Similarly the 30 ANEF zone moves out from Stanmore to Lilyfield (north). However, its movement in the east and west appears marginal.

Yet, the airport lessee company presents these significant environmental data in a "take-it-or leave-it" fashion. There is no due explanation, and no regard to its obligations to "**assess and plan for**" the consequences of the projected environmental impacts as required under the planning obligations created by S. 71(2) of the Airports Act.

SACL cannot refer to its demonstrably inadequate "Environment Strategy" of 1999 [refer S. 16.1] for this purpose [See para 14, above]. That document does not consider noise effects from overflying aircraft. Similarly it cannot rely on its forthcoming requirement to produce a revised strategy in 2004. When SACL produced its 1999 Strategy, as a then creature of government, it refused to consider "downstream environmental effects" such as those created by aircraft noise and pollution.

A provisional assessment obtained by this organisation shows that under the proposed ANEF regime for 2023 the following numbers of people and dwellings will have become affected at the stated ANEF levels (See Table 4).

⁴² An "actual affected period" is a period during which aircraft are actually flying overhead.

TABLE 4 - INCREASED AIRCRAFT NOISE AFFECTATION - 2001-2023:
[refer Appendix "C"]

	AFFECTED BY ANEF 20	AFFECTED BY ANEF 25	AFFECTED BY ANEF 30
PEOPLE ^{# 1}	128,284.14	50,186.25	12,222.85
DWELLINGS	52,085.22	20,376.34	4,962.66
COST OF INSULATION (\$millions)			
AT \$50,000 PER DWELLING	2,604.26	1,018.82	248.13
AT \$100,000 PER DWELLING	5,208.52	2,037.63	496.27
¹ Calculated from the Australian Bureau of Statistics 2001 Census data			

Table 4 reveals that approximately an additional 5000 homes involving 12000 residents will become affected at the ANEF 30 level by 2023. Similarly the increased numbers of dwellings affected at the 25 and 20 ANEF levels will be in a range from 20,000 to 52000, respectively, making a total of over 70,000 additional affected homes involving nearly 200,000 residents!

The Table also shows the cost of insulating the above homes at two nominal cost levels of \$50- \$100,000 . These data should be considered in light of the fact that the Federal Government Grant for noise insulation in Third Runway Affected areas was only \$47,000.

On the above estimates, the total additional insulation cost for new homes affected at the 30 ANEF level would be around \$500 million. For insulation of all new homes affected above the 25 ANEF level the cost would be in the region of \$2.5 billion!

The inadequacy of past noise insulation programs has been referred to above. There are many experts who will testify that a proper insulation requirement for aircraft noise affected residential homes is 25 ANEF, and some will even venture to say that for newly-affected homes a 12 ANEF level is more appropriate in particular cases of extreme affectation.

Therefore this Airport Lessee Company must be required to detail its plans for dealing with potential insulation and resulting medical damages claims from progressively newly exposed residents under its proposed growth plan.

17. Aircraft Noise Submission Summary and Conclusions:

To summarise, this is a plan for environmental urban vandalism on a scale not seen from Sydney Airport since the opening of the third runway. It is one which should not be tolerated, and one for which the Minister or Ministers responsible would be justified in seeking a full environmental impact statement (EIS) , a fully independent specialist review, and full opportunities for community consultation with public meetings at major affected venues.

The Minister would be ill-advised to give a mere perfunctory assessment and kindly nod to this proposal. If he does the eventual cost to the affected Sydney Communities will be immense .

The Government in turn should face the fact that this airport lessee corporation must be made liable in tort for the community harm which will result from the proposed expansion of Kingsford Smith Airport given the manner, and with the minimal environmental assessment which has been presented. The "LTOP - noise share" plan behind which this airport lessee company hides for environmental justification has been hijacked and misdirected away from the high and laudable goals set by then Minister for Transport Sharp in 1996.

It is not a plan which maximises movements over water as promised. It is a plan which instead maximises aircraft movements, takeoffs, noise and crashrisk over the most heavily populated residential areas of Sydney. Not only does it maximise movement and takeoffs over residential areas, but it maximises the use of low-altitude high noise impact flight path trajectories for both arrivals and departures in the most unconscionable way. This is both harmful to Sydney residents and inconvenient for airlines which use more fuel through failure to reach cruising altitude in optimal time.

Sydney Airport Corporation Limited reportedly made its Environment Manager redundant in October 2003^{# 43}. This act took place almost immediately this "Preliminary Draft Master Plan" had been completed! This fact should suggest to anyone with eyes to see and ears to hear that the environmental impact of the airport on its environs is possibly the lowest priority for the management of this Airport lessee company. Yes, this is a "preliminary draft" of the most drafty kind, and it must be rejected at all costs.

18. Community Values: PDMP Section 17

18.1 Introduction:

As mentioned above, the airport lessee company has already made its "Manager, Environment & Community" redundant, one of around half its staff being consigned to uncertainty in the interests of Maximising profits. One could infer that now the PDMP is complete, SACL considers that no environment manager is now needed. Everything will be taken care of by conforming to the formalities of compliance with Part 5 Div. 3 of the Airports Act. With reluctance, and with sadness, one must conclude that this reveals the true status of the new SACL's commitment to "community values."

18.2 Research, Community Attitudes and Master Plan Study - PDMP Sections 17.2 -3

Given that the statistical basis of the sampling employed to estimate the degree of alleged community support for the propositions described is commercial-in-confidence to the researcher, along with the question sheets employed, it is impossible for this organisation to judge whether the reported conclusions are valid or not.

It seems remarkable, however, that a sample as small as 600 can provide outcome data valid for several million people across the residential hinterland of Sydney KSA who are affected by aircraft noise. It would seem that too much would depend on the degree of severity of affectation by aircraft noise, and whether this was recent or historical. However, we do not pretend to judge. Serious questions remain such as:

- *"Were the participants in aircraft affected areas advised that aircraft movements would double and nearly treble in places?"*;
- *"Were the affected-area participants advised that the resulting noise exposure and noise levels would likely require them to noise- insulate their homes and at what cost?"*
- *"Were those noise affected residents north, northwest and east of the airport advised that the proposed traffic expansion over the north was increasing for the relative benefit of the areas around Botany Bay?"*;
- *"Were the noise affected residents advised that "Noise Sharing" had dismally failed to reach its projected targets, and was set to fail more drastically as time wore on?"*
- *"Were the noise affected residents who were consulted advised that "noise sharing" was occurring at the expense of achieving the LTOP objective of maximising movements over water and that, with present airport planning, an even lower proportion of movements would be taking place over Botany Bay?"*;
- *"Were the noise affected residents who were consulted advised that the risk of crash damage over*

⁴³

Govt SACF Observer, Meeting 19 September 2003.

their homes would more than double in 20 years; and that even now the airport is being operated to produce a crash damage risk which is at least 60% greater than would occur for movement maximisation over water?".

All these questions lead one to ask the logical and wholly legitimate question: ***"Just what is going on?"***

18.3 Communication and Consultation - PDMP Section 17.4

The Community Jury Panel Consultation:

SACF Inc has direct experience of this consultation as it was privileged to receive an invitation to participate. SACF Inc is a forum of some twenty airport-affected community groups from all around Sydney which are concerned about aircraft noise and environment impacts but are not permitted representation on the government's consultative forum SACF. The Jury Panel Proposal was put forward by the firm, Twyford Consulting of Wollongong. The question which the jury panel was requested to adjudicate was :

"The founding principle for the Sydney Airport Master Plan is that there will be no change to the basic operating framework of Sydney Airport (that is, there will be no new or altered runways or flight paths, and the legislated curfew and movement cap will remain). Noting that any changes would require stakeholder consultation, is this founding principle appropriate?"

In their written submissions (Presentation Templates) Jury panel presenters were asked to address the following questions:

- 1. What are your main messages for the Community Panel?***
- 2. What evidence do you have to support your messages?***
- 3. Do you support SACL's founding principle?***
- 4. Do you have any other comment for the Community Panel?***

Unlike the Government Forum of similar name , SACF Inc sought to persuade the Jury Panel not to adopt the ***"founding principle"*** in its entirety because it is not convinced that LTOP has been optimally implemented, either from the environmental or safety viewpoint. The positions taken by the presenters of SACF Inc are summarised in the three Presentation Templates in Appendix "A".

Our presentations emphasised the failures of the LTOP "noise-share" plan to comply with the directive of maximising over-water modes, minimisation of noise over residential areas and optimisation of "fair-sharing." The horrendous and totally unnecessary extent of Sydney Basin low-altitude departure flying was emphasised by the speakers of SACF Inc, as well as the failure of government and SACF to address the issue of aircraft noise regulation and noise abatement departure procedure implementation in accordance with international standards (See Appendix "A" for summary details).

Though SACF Inc approached the above consultation rather sceptically, because of the community panel selection process, its participants were impressed by the intelligence and perspicacity of the selected jury panel. The chosen members of the panel exhibited a lively interest and concern about the subject matter and appeared to approach the question without bias , and were not uncritical in questioning of presenters .

In its report, the Community Jury Panel expressed the view that it did not support the ***"founding principle"*** as a ***"total package"***.

Although the airport corporation initially tried to represent through precipitous advertisements in the "Courier" newspapers on 23 June 2003 that the outcome of the panel deliberation was completely affirmative, a later advertisement appeared on 21 July 2003 which partially corrected this impression , much in terms of the wording in the right hand column of p, 136 of S. 17.4 of the PDMP. Just what the airport company thought it was doing by this release has not been made clear.

However, this wording in S. 17.4 still does not express completely the import of the Jury Panel conclusions. The Community Jury Panel report is attached as Appendix "D" to this SACF Inc submission.

From PDMP S. 17.1 (p. 135) it is apparent that the airport lessee company's interpretation of these conclusions does not fully represent the views of the Community Jury Panel. In particular the statement that no new or relocated flight paths are required (S. 17.1 , p. 135) is inconsistent with the following "Jury Panel" conclusion:

"The Panel considers that there are issues about the implementation of the Long Term Operating Plan as the LTOP targets are not being met. The Panel suggests that when decisions are made about flight-paths used by aircraft at any time, the possible alternatives should be weighted by:

- *the time of the day air movements occur*
- *whether the movement is an aircraft arrival or departure (departures are significantly noisier than arrivals)*
- *the size of the aircraft and the level of noise it generates (international 747 aircraft make more noise than smaller aircraft used on regional routes)*
- *the number of residents likely to be affected by the movement on the various flight paths*
- *the noise sharing opportunities."*

When properly weighted by the number of residents affected by aircraft noise it stands to reason that the majority of movements should be over the natural access point for Sydney Airport which is Botany Bay.

Summary of Community Consultation:

In summary, LTOP was not just about "noise sharing", it was primarily about the maximisation of movements over water [See this submission, Para. 11]. Significant over the water options were deliberately eliminated from the official LTOP at an early stage by removal of the main SODPROPs^{#44} Modes 2 and 3 for reasons which have never been adequately justified or were not technically supported by the evidence.

Implementing "noise sharing" for its own sake has resulted in a perverse travesty of the LTOP objectives which was to have supported the government election platform principle of "putting people first."

Instead , criss-crossing arrival and departure flight path patterns over heavily populated residential areas, not envisaged in the Proponent Statement, now force long distance low-flying for all overland departing jets which maximise noise to an extent never achieved before for so many people. These were criticised by BASI in 1998 as introducing a significant element of avoidable risk which placed the onus of avoidance on air traffic controllers, instead on proper airspace design.

Noise minimisation objectives in part achievable by the use of ICAO noise abatement departure protocols and mandated by the Minister for Transport in 1998 have still not been introduced.

Noise sharing opportunities provided by flight track "spreading" have not been uniformly applied in LTOP, eg. no spreading occurs over the Liberal seat of Wentworth in the east.

No independent Safety Audit of the LTOP as now implemented has ever been carried out.

The Government has abrogated its responsibility for aircraft noise minimisation to a politically manipulated "noise share" plan, when it should be legislating for maximum tolerable noise impact levels for aircraft flying over residents in accordance with World Health Organisation guidelines, in a manner consistent with State Government land-use noise controls .

Participants in the consultation process were led to expect that the Community Panel Report and airport company responses would be included in the Master Plan, but this has not so far occurred. It is therefore included here.

⁴⁴ SODPROPs = "Simultaneous Opposite Direction Parallel Runways Operations"

SYDNEY AIRPORT COMMUNITY FORUM INC
SUBMISSION ON
SYDNEY AIRPORT CORPORATION LTD'S
"PRELIMINARY DRAFT MASTER PLAN" JULY 2003

APPENDIX "A" SACF Inc Submissions to "Community Jury Panel" 14 June 2003

1. ***SACF Inc CONTRIBUTION 1***
Sydney Airport Cannot Accommodate doubling movements by 2023
2. ***SACF Inc CONTRIBUTION 2***
The Inadequacies and Failure of "Noise Sharing" under LTOP
3. ***SACF Inc CONTRIBUTION 3***
The Need for a Regulatory Cap on Aircraft Noise from overflying.

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Community Panel Presentation Template for Presenters

The Community Panel will be considering the following question:

"The founding principle for the Sydney Airport Master Plan is that there will be no change to the basic operating framework of Sydney Airport (that is, there will be no new or altered runways or flight paths, and the legislated curfew and movement cap will remain). Noting that any changes would require stakeholder consultation, is this founding principle appropriate?"

In your presentation, please focus on the following in relation to this question,:

1. What are your main messages for the Community Panel?
 - SACF Inc believe that KSA cannot accommodate doubling traffic to 2020 without disastrously affecting residents through Noise and Pollution impacts and loss of effective "Noise Sharing;"
 - SACF Inc has proposed a new 24 hour international and freight airport on the rim of the Sydney Basin connected by High Speed Rail and existing Motorway to Sydney and KSA;
 - Then KSA should operate as a daytime only domestic airport with an extended curfew similar to that enforced at Reagan National Airport at Washington DC in the USA;
 - SACL itself has admitted that use of the East-West runway may need to be curtailed by 2005 which in itself indicates that the LTOP "Noise Share" plan will not be tenable for very much longer.
2. What evidence do you have to support your messages?
 - Many alternative EIS's over many years have produced differing estimates for traffic growth at KSA an average being 4% per annum, why should we believe these figures?
 - This airport formula has proved satisfactory for Washington DC for many years, and is the successful model for the new international Airports servicing Athens, Hong Kong and Kuala Lumpur;
 - Because of its proximity to inner city residents, the expansion of KSA to double or greater than present movements will result in forced draft urban demolition around the airport such as is being experienced at Minneapolis-St. Paul in the USA and has already occurred at Sydenham.
 - A curfew extension is necessary because too many people are either woken too early or kept awake too late using the current hours;
 - More freight than could ever be accommodated by KSA could be dealt with by an out-of-basin 24 hour international airport without further degrading the Sydney residential environment by having B-Doubles and all-night freight trains travelling through inner Sydney suburbs around the clock.
 - The additional 20-50 minute travel time from an out-of basin site, properly connected by fast rail to KSA and Sydney Central, will be a small additional travel component for International passengers.
3. Do you support SACL's founding principle that there should be no change to the basic operating framework of Sydney Airport?

NO! With the exception of no new runways; keep and extend the curfew; and retain the movement cap

4. Do you have any other comment for the Community Panel?
 - Present Govt SACF "Noise Share" flight path plan should not be immutable because it does not embody "World's Best Practice" Noise Abatement Rules and adversely affects many more people more frequently than is reasonably necessary;
 - Representation on SACL-and air-traffic-management (eg. IMC) -Stakeholder consultative forums should be proportional to affectation by number of residents overflowed by aircraft, not by a gerrymandered forum representing only selected geographic areas.
 - State Environmental Protection Laws should apply to health-related noise and air pollution from aircraft. Quantitative noise metrics applicable to maximum acceptable sound levels in residential dwellings should be employed.
 - Until aircraft affected environmental concerns have been fully addressed by SACL and the Government *it should never be assumed* that flight track arrangements need never be changed.

Presenter name: Richard J. Tanner [Chairman, SACF Inc]

Allocated presentation day and time: Sat 14/6/2003 15:30 - 17:00pm

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People, Strategy and Management Specialists

Community Panel Presentation Template for Presenters

The Community Panel will be considering the following question:

"The founding principle for the Sydney Airport Master Plan is that there will be no change to the basic operating framework of Sydney Airport (that is, there will be no new or altered runways or flight paths, and the legislated curfew and movement cap will remain). Noting that any changes would require stakeholder consultation, is this founding principle appropriate?"

In your presentation, please focus on the following in relation to this question,:

1. What are your main messages for the Community Panel?

- The present Govt SACF "Noise Share" flight path plan should not be considered immutable because it is not "World's Best Practice" and adversely affects many more people more severely than reasonably necessary;
- Noise Minimisation is not addressed in the Govt SACF "Noise Share" Plan, and must be addressed asap through flight path altitude maximisation, implementation of 100% ICAO noise abatement SIDS and a "Noise Critical Altitude" over city residents compatible with Worlds Best Practice;
- Flight Track plans over Sydney are presently "confused" with arrivals overflying simultaneous departing aircraft when jets take off north fanning northwest, and east across the city. This is not the published LTOP design and results in excessively low flying over residents with higher conflagration risk due to the possibility of collision between departing and arriving jets;
- Jet Aircraft Crash Risk to Residential Areas should be minimised by maximising jet aircraft movement, especially departures over the ocean and Botany Bay, rather than over heavily populated residential areas as presently practiced;
- The principal "Noise Share" tenet under LTOP which has not been implemented is to "MAXIMISE MOVEMENTS OVER BOTANY BAY;"
- Strict fines should be imposed for pilots and airlines for exceeding set noise limits and noise abatement rules over residential areas similar to those imposed in France and in the USA at Boston Logan and Washington DC .

2. What evidence do you have to support your messages?

- More aircraft movements and departures now take place over residential areas everywhere in Sydney than ever before;
- There is no mention in the "Fair Share Noise Plan" (LTOP) of the need for Noise Minimisation from aircraft;
- Flight track diagrams will be presented comparing the dangerous "spaghetti junction" airspace situation with the original plan;
- Other airports have strict guidelines, with penalties for exceeding either specific noise limits or flight path deviations;
- Other airports restrict movements to not less than a "noise critical altitude" over cities, eg. Canberra ie. 5000 & 7000 ft, while aircraft from KSA travel at 2000-3500 feet for extended distances as far as -40 km from takeoff, and during arrival prior to landing thereby maximising noise and pollution distribution over residential areas;
- While crash risk from jet aircraft is approximately equal for landings and departures, some aircraft types are more prone to crashing on takeoff, and departing aircraft carry full fuel loads, as much as 160 tonnes for long-haul jumbos. - Remember September 11!!;
- The LTOP noise plan promised to maximise movements over water and only put aircraft over residential areas when absolutely necessary. In operation it has reduced both movements (55 - 45%) and the number of the noisiest departures over Botany Bay (65 - 44%), **and put them over residents!;**
- Our review of international Noise Abatement Rules shows that rather than adopting world's best practice, KSA is far from the point of even defining what it is. Even Canberra Airport has a "Noise Critical Altitude" for residential areas of 7000ft for jets!

3. Do you support SACL's founding principle that there should be no change to the basic operating framework of Sydney Airport?

NO! With the exception of no new runways; keep and extend the curfew; and retain the movement cap

4. Do you have any other comment for the Community Panel?

- SACF Inc believes that KSA cannot accommodate doubling traffic to 2020 without disastrously affecting residents through Noise and Air Pollution impacts and loss of effective "Noise Sharing"; and that KSA should operate as a daytime only domestic airport with an extended curfew similar to that enforced at Reagan National Airport at Washington DC in the USA;
- Representation on SACL-and air-traffic-management (eg. IMC) -Stakeholder consultative forums should be proportional to affectation by number of residents overflown by aircraft, not by a gerrymandered forum representing only selected geographic areas.
- State Environmental Protection Laws should apply to health-related noise and air pollution from aircraft. Quantitative noise metrics applicable to maximum acceptable sound levels in residential dwellings should be employed.

Presenter name: Henri P. Richard [VP Airport Operations, SACF Inc]

Allocated presentation day and time: Sat 14/6/2003 15:30 - 17:00pm

Please complete and return this form. by Wednesday, 11th June, to Twyford Consulting,
MC Box 6004, South Coast Mail Centre, NSW, 2521 or fax to 02 42264042

TWYFORD CONSULTING

People, Strategy and Management Specialists

Community Panel Presentation Template for Presenters

The Community Panel will be considering the following question:

"The founding principle for the Sydney Airport Master Plan is that there will be no change to the basic operating framework of Sydney Airport (that is, there will be no new or altered runways or flight paths, and the legislated curfew and movement cap will remain). Noting that any changes would require stakeholder consultation, is this founding principle appropriate?"

In your presentation, please focus on the following in relation to this question,:

1. What are your main messages for the Community Panel?

- There is no present regulatory cap on permissible noise from flying aircraft at ground level which has the same force as State Government regulations applying to noise from industrial sites adjacent to residential areas;
- This is because the Commonwealth Government which administers the Air Traffic Controllers & Airports Rules overrides State Land Use Laws, and there is no cooperation between the Commonwealth and States affecting noise and pollution impacts from aircraft; Airservices Australia is given the responsibility to protect the environment from the effects of the operation and use of aircraft; At Sydney it has failed to fulfil this role;
- SACF Inc believes that best practice at airports overseas prescribes the maximum noise that aircraft are permitted to make at points on the ground a given distance from takeoff or landing;
- Additionally or in the alternative they provide a "Noise Critical Altitude" below which aircraft may not fly over residential areas of their cities;
- Flight paths impact human health, entailing noise insulation of dwellings and unless authorities agree to pay for insulation requirements meeting the Australian Standard AS 2021, flight path changes are required which avoid that need;
- SACF Inc says that Australia, and Sydney (Kingsford Smith) Airport in particular, should start a consultative process with Stakeholders (including community-based), Standards Australia, The National Health & Medical Research Council, the AMA and the National Acoustic Laboratories to determine maximum acceptable (day and night) levels of aircraft noise which people in residential areas should be expected to bear;
- In this consultative process the effect on health and the human living environment in Sydney should be regarded as of paramount importance.

2. What evidence do you have to support your messages?

- See Airservices Act (1995) and Regulations; Air Navigation Act (1925) and Regulations; Airports Act (1996) & Regulations;
- See National Environment Protection Measures (Implementation) Act 1998 [The NEPM Act]. This Act empowers State and Federal cooperation in the area of environmental protection through the use of so-called "National Environmental Protection Measures" [NEPMs] which are implemented under the National Environment Protection Council Act (1994) Cth.;
- The Sydney Aircraft Noise Insulation Program (SANIP) was never been completed to the requirements of AS2021.
- Lung Cancer Statistics in Sydney show concentrations around the vicinity of airport sites;
- The NSW Environmental Protection Authorities "Noise Policy Document" (January 2000) recommends a maximum noise level equivalent ($L_{eq\ 15\ min}$) of 55 dB(A) in daytime and 45 dB(A) at night; while the World Health Organisation recommends a maximum daytime noise level of 55 dB(A) and 45 dB(A) at night.

3. Do you support SACL's founding principle that there should be no change to the basic operating framework of Sydney Airport?

NO! With the exception of no new runways; keep and extend the curfew; and retain the movement cap

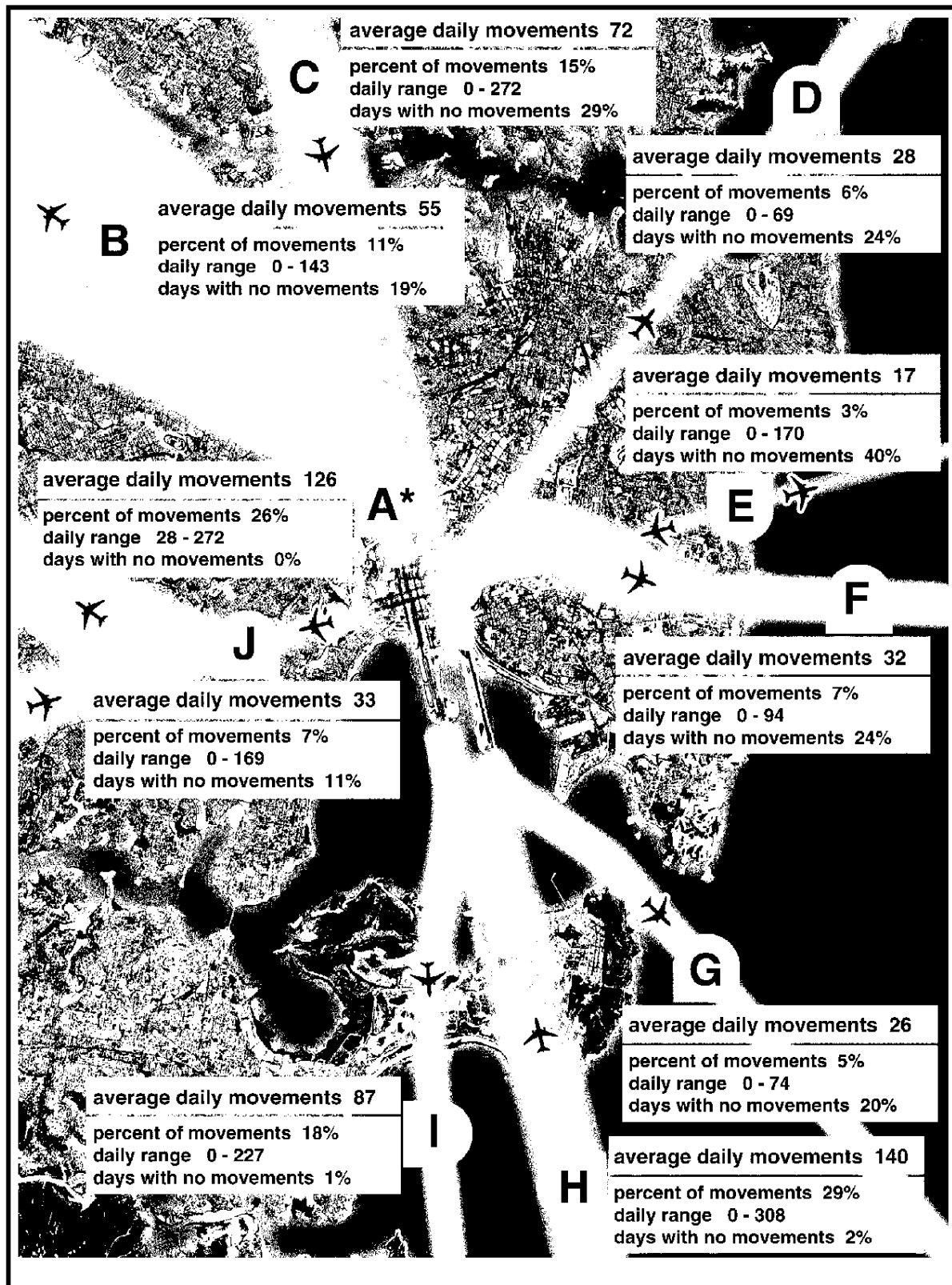
4. Do you have any other comment for the Community Panel?

- SACF Inc believes that KSA cannot accommodate doubling traffic to 2020 without disastrously affecting residents through Noise and Air Pollution impacts and loss of effective "Noise Sharing;" and that KSA should operate as a daytime only domestic airport with an extended curfew similar to that enforced at Reagan National Airport at Washington DC in the USA;
- Representation on SACL-and air-traffic-management (eg. IMC) -Stakeholder consultative forums should be proportional to affectation by number of residents overflown by aircraft, not by a gerrymandered forum representing only selected geographic areas.
- State Environmental Protection Laws should apply to health-related noise and air pollution from aircraft. Quantitative noise metrics applicable to maximum acceptable architectural sound levels in residential dwellings should be employed;
- Until aircraft induced health and environmental concerns have been fully addressed by SACL and the Government *it should never be assumed* that flight track arrangements need never be changed.

Presenter name(s): John Dale &/or Philip S. Lingard [VP Aircraft Noise Regulation, & /or Secretary, SACF Inc]
Allocated presentation day and time: Sat 14/6/2003 15:30 - 17:00pm

APPENDIX "B" Sydney Airport Average Daily Movements 1/1/2000 - 31/1/2001.

DOTARs Statistics distributed by Stolzznow



SYDNEY AIRPORT COMMUNITY FORUM INC
SUBMISSION ON
SYDNEY AIRPORT CORPORATION LTD'S
"PRELIMINARY DRAFT MASTER PLAN" JULY 2003

APPENDIX "C" **THE COST OF SYDNEY AIRPORT'S MASTER PLAN:
THE SPREAD OF AIRCRAFT NOISE AFFECTATION BY POPULATION
AND DWELLING**

THE COST OF SYDNEY AIRPORT'S MASTER PLAN: THE SPREAD OF AIRCRAFT NOISE AFFECTATION BY POPULATION AND DWELLING

P.S. Lingard B.Sc., Ph.D., LLB., M.Inst.P. (UK)., MIE Aust., C. Phys., C.P. Eng (Biomed)
Sydney Airport Community Forum Incorporated

Synopsis:

In its Preliminary Draft "Master Plan" Sydney Airport Corporation Limited (SACL) proposes to increase passenger movements by 4.2% per annum and aircraft movements by 2.4% per annum between 2001 and 2023 with the result that passenger movements in 2023 will reach 68.3 million (2001 data ca. 24 million) and aircraft movements will reach 412,000 per annum (254,729 in 2001-2) .

Airservices Australia was contracted by SACL to produced an "Aircraft Noise Exposure Forecast" (ANEF) chart for the airport in 2023, and an "Aircraft Noise Exposure Index" (ANEI) for the year 2001 as a basis for comparing the resulting impact increase on affected Sydney residential communities. The results are provided in Figure 16.5 of the Preliminary Draft Master Plan (PDMP) document.

Given that this increase in traffic movements is convenient for SACL to offer its shareholders as an incentive for investment, is it surprising that the PDMP provides no assessment of the resulting noise impact on its neighbouring residents other than to present the data? No cost benefit analysis is provided by which the community can assess the degree to which the benefit to the airport corporation from its proposed expansion can be offset against the damage to the community caused by the extension of the predicted noise contours overland.

This brief paper takes the ANEF/ANEI charts from the PDMP with the Australian Bureau of Statistics Census statistics for 2001 and calculates the increased numbers of people and existing dwellings which will become moderately- to severely- noise affected by aircraft in accordance with the terms of Australian Standard AS 2021-2000 . It also estimates the cost of various levels of noise insulation which will inevitably be required for dwelling protection, assuming that somebody can be made liable for the resulting environmental harm .

The paper concludes that the number of people to be transferred into the zone that AS 2021-2000 describes as **"unacceptable"** for residential home construction will be in the order of 52000 . The corresponding number of dwellings is around 25000 and the additional cost of noise insulation to satisfy the Australian Standard would be ca \$2.5 billion dollars at an average cost per dwelling of \$100,000.

Similarly the number of people to be transferred from the zone below 20 ANEF which is currently defined as **"acceptable"** for residential dwelling construction to one which is only **"conditionally acceptable"** (ie between 20 and 25 ANEF) will be around 128, 000 representing around 52000 dwellings. Within this zone the Australia Standard says that up to 45% of people will be moderately to severely affected by the resulting aircraft noise, and that *"land use authorities may consider that the incorporation of noise control features in the construction of residences and schools is appropriate."* Should this be found to be the case then the cost of insulating all existing dwellings in these areas would be in the region of an additional \$5.2 billion at an estimated cost per dwelling of \$100,000 .

Note : The Federal Government only ever allowed a grant of \$47000 for the worst - affected zones (> 30 ANEF) under the defective "Sydney Airport Noise Insulation Program" (SANIP), implemented only reluctantly by government after opening of the Third Runway.

Introduction:

In its Preliminary Draft "Master Plan" Sydney Airport Corporation Limited (SACL) proposes to increase passenger movements by 4.2% per annum and aircraft movements by 2.4% per annum between 2001 and 2023 with the result that passenger movements in 2023 will reach 68.3 million (2001 data ca. 24 m) and aircraft movements will reach 412,000 per annum (254,729 in 2001-2) . Airservices Australia was contracted by SACL to produced an "Aircraft Noise Exposure Forecast" (ANEF) chart for the airport in 2023, and an "Aircraft Noise Exposure Index" (ANEI) for the year 2001 as a basis for comparing the resulting impact increase on affected Sydney residential communities. The results are provided in Figure 16.5 of the Preliminary Draft Master Plan (PDMP) document.

Given that this increase in traffic movements is convenient for SACL to offer its shareholders as an incentive for investment, it is hardly surprising that the PDMP provides no assessment of the resulting noise impact on its neighbouring residents other than to present the ANEF/ANEI comparison data. No cost benefit analysis is provided by which Sydney Community can assess the damage to it caused by the extension of noise affectation, for offset against the degree to which the airport corporation benefits from its proposed expansion.

This brief paper takes the ANEF/ANEI charts from the PDMP with the Australian Bureau of Statistics Census statistics for 2001 and calculates the increased numbers of people and existing dwellings which will become moderately- to severely- noise affected by aircraft in accordance with the terms of Australian Standard AS 2021 -2000 . It also estimates the cost of two monetary levels of noise insulation which be required for their protection assuming that somebody anyone can be held liable for the resulting environmental harm.

Methods:

The ANEF/ANEI comparison chart from Figure 16.5 of Sydney Airport Corporation's Preliminary Draft Master Plan (PDMP) was scanned into a computer. An Adobe Photodeluxe[®] Business Edition multilayered photo-file was created from it . The section of the ANEF/ANEI chart built into the photo-deluxe (*.pdd) file is shown herein as Figure 1.

A scanned image of Sydney Local Government Areas (LGA) map^{# 1} , corresponding to those in existence at the time of the 2001 Census , was then superimposed as a separate layer onto the ANEF/ANEI chart and its scale adjusted to match the latter. The portion of the Sydney LGA map employed is reproduced in Figure 2.

¹ Sydney , Newcastle , Wollongong Local Government Areas , NSW Dept. Land & Water Conservation, October 1993 [Inset]

Figure 1: The Sydney Airport Draft 2023/24 ANEF and 2001 ANEI:

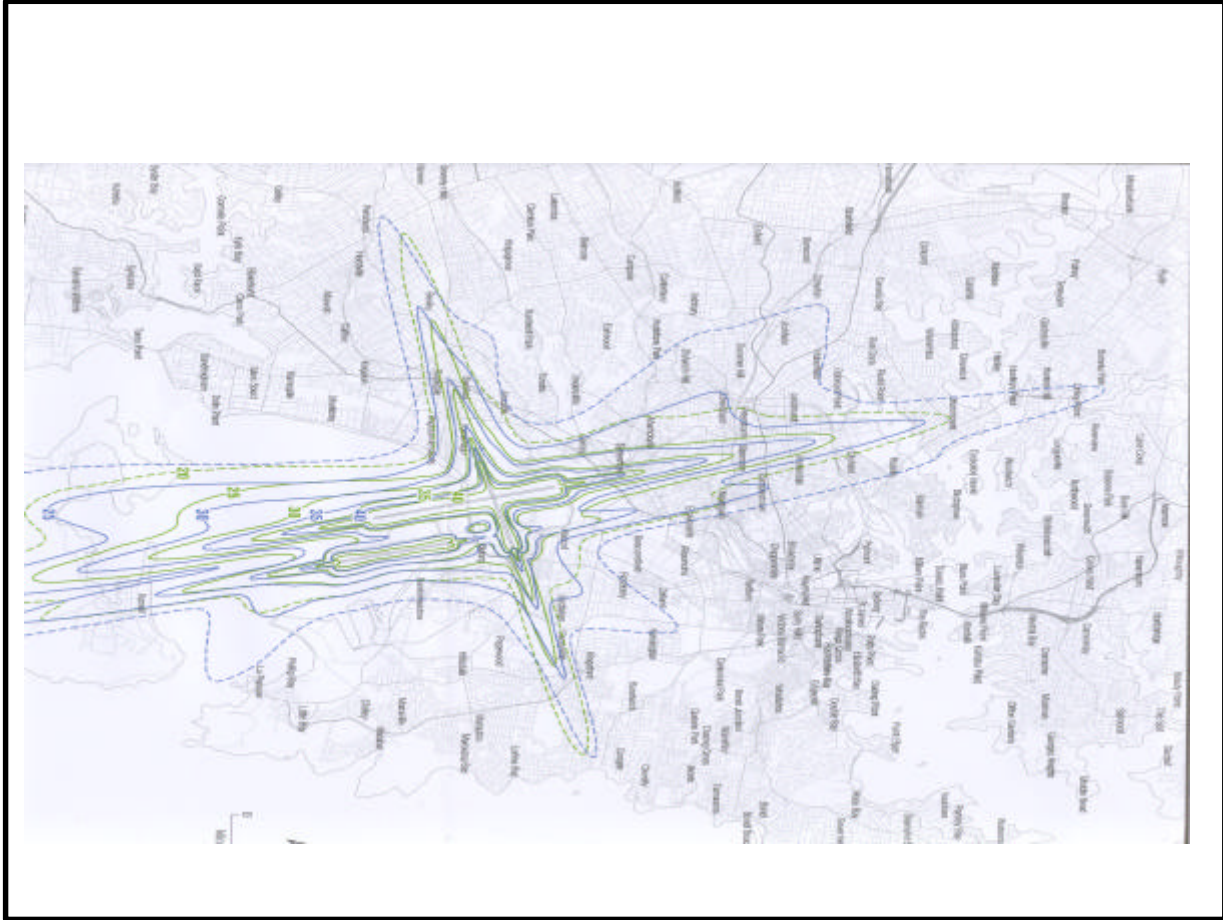
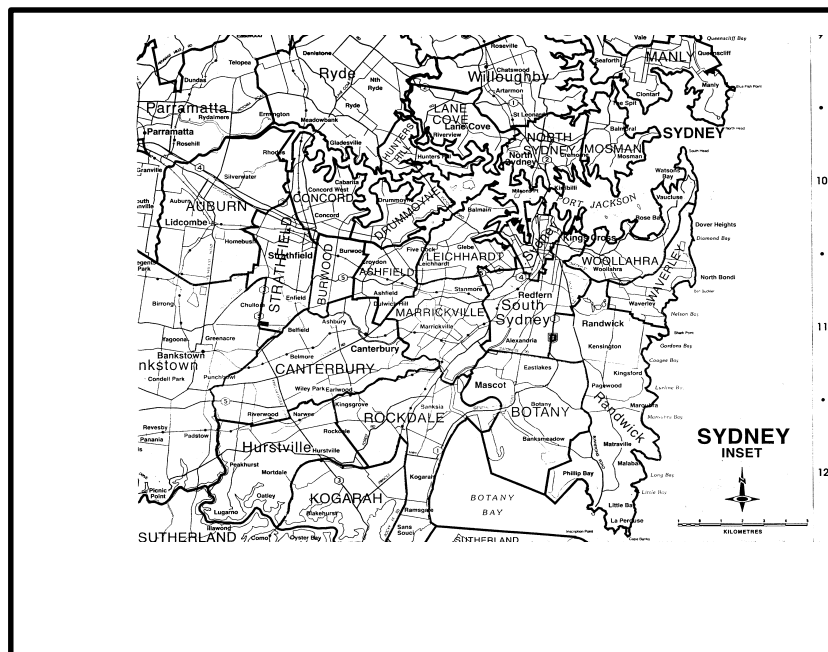


Figure 2 Local Government Area Boundaries October 1993 - Sydney Area



The images were made transparent, blended and contrast-adjusted using the facilities available in the Photodeluxe^R software package. Finally, an image of a graph paper grid was added as a third layer and similarly blended so that the data on all three images could be seen together. The dimensions of the grid squares on the screen were calibrated using the LGA map scale and the fiduciary distance between Stanmore and Redfern CitiRail Stations (2.326km). Each grid square was found to correspond to an area of 0.119 square kilometres. The resulting graphic is reproduced in Figure 3.

Data were obtained from the Australian Bureau of Statistics internet web site for Census 2001^{#2} for the then existing populations and numbers of dwellings in the Local Government Areas most severely affected by aircraft noise. The LGAs included were Ashfield, Drummoyne, Leichhardt, Marrickville, South Sydney, Randwick, Rockdale and Botany. These data are reproduced in Table 1.

The total numbers of grid squares were then counted within each Local Government Area and between the 20, 25 and 30 ANE* contours for the 2001 ANEI and the 2023 ANEF. This estimate was made to the nearest 0.05 grid square and is accurate to approximately 0.1 square. Only grid squares corresponding to areas on the map which were residential in nature were counted. Water and open land areas were specifically excluded from the counts. Where the 2023 ANEF had retreated from the corresponding 2001 ANEI position the grid square area was subtracted from instead of being added to the total.

² <http://www.abs.gov.au> - Look for Census 2001, Free data

Figure 3: Superimposition of Figures 1 and 2 as scaled and overlain with Fiduciary Grid

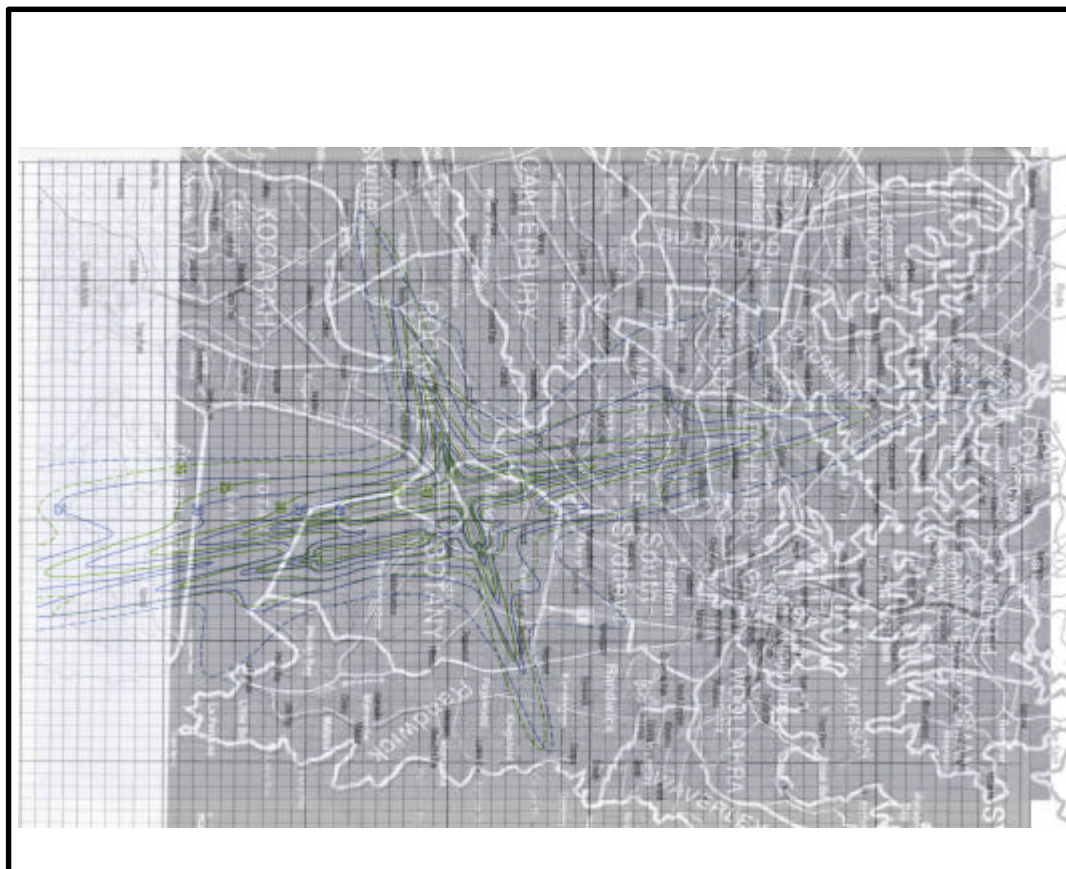


TABLE 1 Local Government Area Statistics - ABS Census 2001

SUBURB	POPULATION	DWELLINGS SINGLE	DWELLINGS SEMI OR TERRACE	DWELLINGS FLAT/UNIT	DWELLINGS OTHER
<i>ASHFIELD</i>	39,494	5,794	1,882	7,206	162
<i>DRUMMOYNE</i>	32,972	6,623	1,736	5,328	116
<i>LEICHHARDT</i>	62,452	8,417	10,475	8,437	344
<i>MARRICKVILLE</i>	73,431	10,057	8,144	10,752	778
<i>S. SYDNEY</i>	92,249	1,533	12,492	27,907	457
<i>RANDWICK</i>	121,497	14,448	7,577	24,737	503
<i>ROCKDALE</i>	88,523	17,503	4,024	11,118	327
<i>BOTANY</i>	35,897	5,590	2,021	5,297	108
<u>TOTALS</u>					
POPULATION	546,515	69,965	48,351	100,782	2,795
DWELLINGS		221,893			

The numbers of grid squares counted for the representative local government areas for which populations and dwelling counts were obtained from Australian Census 2001 data , and for the shift in position of the ANEI/ANEF contours, are shown in Table 2.

TABLE 2 GRID COUNTS CORRESPONDING TO LOCAL GOVERNMENT AREA AND ANEF SHIFT

(1) BY LGA	GRID SQUARES
<i>ASHFIELD</i>	67.7
<i>DRUMMOYNE</i>	159.2
<i>LEICHHARDT</i>	53
<i>MARRICKVILLE</i>	123.4
<i>S. SYDNEY</i>	151.7
<i>RANDWICK</i>	179.4
<i>ROCKDALE</i>	55.4
<i>BOTANY</i>	189.5
<u>TOTAL GRID SQUARES</u>	<u>979.2</u>
(2) BY ANEI/ANEF	GRID SQUARES
<i>ANEF 20</i>	229.9
<i>ANEF 25</i>	89.9
<i>ANEF 30</i>	21.9

The average number of dwellings was then calculated per representative grid square, which is 226.81.

The assumption employed is that each dwelling , whether single house, semi, terrace or apartment carries the same weight, as far as insulation cost is concerned. For a provisional analysis this assumption is reasonable, since it is the duty of Sydney Airport Corporation to carry out this study anyway, had its concerns for its so-called community "stakeholders" been great as those for its shareholders.

Results:

Using the Dwelling count per grid square the number of dwellings affected by each shift in ANEF/ANEI zone was calculated as shown in Table 3 and the effective cost of noise insulation calculated for two cost assumptions of \$50,000 and \$100,000 per dwelling. The former amount is approximately that allowed by government as a grant for insulation of homes in the 30-40 ANEF area Sydenham ^{# 3}.

³ Fitzgerald, P. (1998) The Sydney Airport Fiasco, Hale and Iremonger, p. 143.

Table 3 Number of Dwellings in Areas affected by Projected Shift of ANEF by Year 2023

	AFFECTED BY ANEF 20	AFFECTED BY ANEF 25	AFFECTED BY ANEF 30
No GRID SQUARES	229.85	89.92	21.9
PEOPLE	128,284.14	50,186.25	12,222.85
DWELLINGS	52,085.22	20,376.34	4,962.66
COST OF INSULATION (\$millions)			
AT \$50,000 PER DWELLING	2,604.26	1,018.82	248.13
AT \$100,000 PER DWELLING	5,208.52	2,037.63	496.27

The Table lists only those dwellings affected by the proposed shift in the position of the ANEF contours as predicted between 2001 and 2023. It does not include those already adversely affected by the introduction of LTOP in areas where there was not previously any aircraft noise.

In order to assess whether it is reasonable for persons whose dwellings are thus affected to make a claim for noise insulation on their dwelling it is necessary to consider the guidelines in Australian Standard AS 2021-2000 ^{# 4}.

Table 2.1 of the above Standard prescribes that only building sites where the ANEF is less than 20 are **"Acceptable"** for the construction of houses, home units, flats or caravan parks, without special provision being made for noise insulation according to the Standard. If the ANEF is between 20 and 25 then construction becomes **"Conditionally Acceptable"**, ie :

"some people may find that the land is not compatible with residential or educational uses. Land use authorities may consider that the incorporation of noise control features in the construction of residences or schools is appropriate" ^{# 5}

If the ANEF is greater than 25, then according to the Standard the siting of residential constructions becomes **"Unacceptable"**, and the Standard does not recommend development in unacceptable areas. If however a planning authority determines that a development is necessary, the Standard recommends that specific "noise reduction" levels [ANRs ^{# 6}] be achieved to bring the indoor level to that specified by Table 3.3 of the Standard. For residential relaxing and sleeping areas AS 2021-2000 Table 3.3 requires this level to be 50 dB(A). At the time of the "Third Runway" debacle, the Community Advisory Committee (CAC), the NSW Environmental Protection Agency (EPA) and the then Commonwealth Environment Protection Agency all recommended that on human health and welfare grounds all residences and schools within the 25 ANEF contour should be insulated ^{# 7}. However, the government never complied with this recommendation. Only some homes in the 30 ANEF zone were ever offered insulation, and then at a rate which could never compensate the residents for the gross nuisance they were obliged to suffer ^{# 8}.

Conclusions:

The paper concludes that the number of people to be shifted into the zone that AS 2021-2000 described as **"unacceptable"** for residential home construction is significant and, without assuming any population growth or increased housing density, will be in the order of 62000. The corresponding number of dwellings at 2001 census levels is around 25000. For these dwellings the additional cost of noise insulation to satisfy the Australian Standard would be around \$2.5 billion dollars at an average cost per dwelling of \$100,000 ^{# 9}.

⁴ Acoustics - Aircraft noise Intrusion- Building siting and construction, AS2021-2000

⁵ ibid AS 2021-2000 Table 2.1

⁶ ANR = Aircraft Noise Reduction

⁷ Fitzgerald, P. (1998) The Sydney Airport Fiasco, Hale and Iremonger, p. 134-135.

⁸ ibid Fitzgerald

Similarly the number of people to be shifted from the zone below 20 ANEF which is currently defined as **"acceptable"** for residential dwelling construction to one which is only **"conditionally acceptable"** (ie between 20 and 25 ANEF) will be around 138, 000 representing around 52000 dwellings. Within this zone the Australian Standard AS2021-2000 states that up to 45% of people will be moderately to severely affected by the resulting aircraft noise, and that:

"land use authorities may consider that the incorporation of noise control features in the construction of residences and schools is appropriate." # ¹⁰

Should this be found to be the case then the cost of insulating all existing dwellings in these areas would be in the region of an additional \$5.2 billion at an estimated cost of \$100,000 per dwelling.

This should be considered in light of the fact that successive Federal Governments have only ever allowed a grant of \$47000 for the worst - affected zones (> 30 ANEF) under the defective "Sydney Airport Noise Insulation Program" (SANIP) implemented only reluctantly by government following opening of the Third Runway; and then only after intolerable delays. Who then is going to pay for the noise disruption caused by the airport expansion now proposed by Sydney Airport Corporation in its Preliminary Draft Master Plan ?

⁹ The \$47,000 offered by government for Third Runway insulation was only a "grant" and did not represent the full cost of noise insulation to the requirements of the Australian Standard .

¹⁰ AS2021-2000, Table 2.1, Note 2

SYDNEY AIRPORT COMMUNITY FORUM INC
SUBMISSION ON
SYDNEY AIRPORT CORPORATION LT D'S
"PRELIMINARY DRAFT MASTER PLAN" JULY 2003

APPENDIX "D" "Community Jury Panel" Report

Report of Community Panel to Sydney Airport Corporation Limited

A component of the Community Consultation for the Master Planning process for Sydney Airport

The Question

“The founding principle for the Sydney Airport Master Plan is that there will be no change to the basic operating framework of Sydney Airport (that is, there will be no new or altered runways or flight paths, and the legislated curfew and movement cap will remain). Noting that any changes would require stakeholder consultation, is this founding principle appropriate?”

The Response

After a briefing, a tour of the Airport, listening to a range of presenters over three days, and deliberating for a day, the Community Panel of fifteen members unanimously responded to the question put as follows:

The Panel does not support the founding principle as a total package.

In order to communicate clearly to Sydney Airport Corporation on the Panel’s deliberations, the Panel considered each component of the question separately.

CURFEW

The Panel supported the principle of no change to the present curfew, which applies to aircraft movements at Sydney Airport between 11 pm and 6 am each day.

CAP

The Panel supported the principle of no change to the present cap of 80 aircraft movements in any one hour.

PRINCIPLES OF LTOP

The Panel supported the noise-sharing principles of the Long Term Operating Plan as provided to them:

- Minimise and share noise
- Where possible flight paths over water and non-residential areas
- Respite from aircraft noise
- Residents not overflowed by both departing and landing aircraft

IMPLEMENTATION OF LTOP

The Panel considers that there are issues about the implementation of the Long Term Operating Plan as the LTOP targets are not being met. The Panel suggests that when decisions are made about flight-paths used by aircraft at any time, the possible alternatives should be weighted by:

- the time of the day air movements occur
- whether the movement is an aircraft arrival or departure (departures are significantly noisier than arrivals)
- the size of the aircraft and the level of noise it generates (international 747 aircraft make more noise than smaller aircraft used on regional routes)

- the number of residents likely to be affected by the movement on the various flight paths
- the noise sharing opportunities.

RUNWAYS

The Panel did **not** reach unanimous agreement on the principle of no change to runways at Sydney Airport.

Twelve of the Panel members supported the principle of no change to runways on the basis that there is no need to extend the life of Kingsford Smith Airport if a Second Sydney Airport is to be built.

Three of the Panel supported a review of the current runway system so that there could be better implementation of noise sharing principles during whatever period of time remains prior to the provision of a Second Sydney Airport.

SECOND SYDNEY AIRPORT

The Panel also considered the concept of a Second Sydney Airport. SACL had indicated in information presented to the Panel that the current site is able to handle the projected increase in passenger and aircraft traffic over the next twenty years and therefore SACL would make no reference to a Second Sydney Airport in the Master Plan.

At least one member of the Panel supported SACL's view that the present site can handle the anticipated increase in passenger and aircraft traffic and movements for the next twenty years.

However, the Community Panel believed that consideration of a Second Sydney Airport is integral to any long term planning perspective for the present Sydney Airport site. The Panel strongly supports the Federal Government's proposed review of the need for a Second Sydney Airport to be held in 2005.

Messages to SACL and other relevant authorities.

The Community Panel, having responded to the various components of the question they were asked to address, identified a number of issues they felt had arisen for them out of the information they had been given during the presentations.

They requested that the following messages be conveyed to SACL and other relevant authorities as a result of their discussions.

The Panel is aware that not all information relevant to these messages was presented to them during the presentation days however they believe their perspective provides value.

Issue: Flight Paths and noise sharing

MESSAGE 1

The Panel recommends that the relevant authorities establish a model for assessing noise impacts of flight paths that incorporates criteria and weightings for:

- Time of the day air movements occur
- Arrivals versus departures
- Type of aircraft (i.e. large jet, small jet and propeller)
- Population densities of surrounding areas
- Spread of flight paths

MESSAGE 2

The Panel recommends that the noise sharing principles of the Long Term Operating Plan be embedded into SACL's Master Plan and into legislation governing the operation of Sydney Airport.

MESSAGE 3

The Panel supports the suggestion of the use of continuous descent landings in order to reduce noise over populated areas, consistent with LTOP principles.

Issue: Investigations of Options for Growth - Second Airport and KSA Runways

MESSAGE 4

The Panel strongly recommends that the Federal Government should carry out a review of the need for a Second Sydney Airport, and a suitable site for such a facility.

Issue - Concerns about Worsening Air and Traffic Congestion with expansion

MESSAGE 5:

The Panel suggests that the expansion of the airport will need to take into account access to the Airport including improvements to public transport. Projected population increases resulting from urban consolidation policies, and the inevitable flow-on effect with increasing traffic congestion must also be considered in this context. The Panel was also concerned that Air Space saturation will occur with the increased number of movements.

The Panel recommends that all layers of Government partner more effectively to address the worsening situation with traffic congestion and related infrastructure. It also recommends that a mechanism be established to ensure there is sufficient investment in improved infrastructure.

Issue - Reviews of Impact on Environment

MESSAGE 6

The Panel suggests that, consistent with the Human Rights legislation, relevant governments should put in place legislation to ensure Airport operations are subject to air quality and noise monitoring, which should be undertaken independently, scientifically, regularly and transparently.

The Panel recommends that the relevant authority should continue to expand the residential noise insulation program in line with impacts from airport expansion.

Issue - Minimising health impacts using World Health Organisation standards as they impact on Sydney community

MESSAGE 7

The Panel recommends that regular monitoring of health impacts is undertaken for the whole Sydney Basin. It also recommends a risk management approach be embraced by SACL, which would include appropriate projected risk identification and ongoing risk management with respect to human health and the natural environment.

Issue - Reassure the public on security issues concerning airport, and surrounding airspace

MESSAGE 8

The Panel suggests that management of security risk in and around the Airport is extremely important and needs to be visible.

The Panel recommends that procedures should be continually reviewed to identify and reduce risks and to ensure an appropriate level of visible security at and around the airport.

Issue - Honesty and accountability from all parties

MESSAGE 9

The Panel recommends that airport flight paths and environmental risk should be managed by an independent professional body and they should not be subject to political influence.

Issue: Ensure Stakeholder Satisfaction

MESSAGE 10

The Panel suggests that improved communication would raise awareness and improve tolerance of airport issues. In the absence of credible and well-presented information in relation to environmental management and security, people will 'make up their own truth'.

MESSAGE 11

The Panel recommends that the aviation industry should endeavour to reduce costs, and/or improve value for money, for travellers, by improving operational efficiencies and by benchmarking against world best practice.