



29 July 2010

Ms Jeanette Radcliffe  
Committee Secretary, Senate Rural and Regional Affairs and Transport References Committee

By email: [rrat.sen@aph.gov.au](mailto:rrat.sen@aph.gov.au)

Dear Ms Radcliffe,

**Re: Airports Amendment Bill 2010**

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Southern Sydney Regional Organisation of Councils (SSROC) is an association of sixteen local councils in the southern area of Sydney. SSROC provides a forum for the councils to deal with common issues, particularly those that cross boundaries. Sydney (Kingsford Smith) and Bankstown airports are located within our region, and are key elements in our regional economy, with their operations and local supporting businesses providing many jobs and commercial opportunities. The region has a unique mix of industrial, commercial and residential land usage, some of which results in considerable noise and subsequent loss of amenity: much of our region is directly under the flight paths of aircraft arriving and departing. SSROC therefore has a keen interest in the operation and development of the airports, and welcomes the opportunity to comment on the proposed amendments to airports legislation.

The Explanatory Memorandum circulated by authority of the Minister highlights a number of key areas for improvement in the legislation. From the perspective of SSROC, the major issues that need to be addressed in further development of the legislation include:

1. Integration of airport plans with local area strategic plans – there is currently limited requirement or opportunity for plans to be integrated, or even simply aligned, since each plan is developed under a separate regulatory framework and to different timeframes. Yet there could be potential for good synergy between the two sets of plans if mechanisms existed to allow this to occur.
2. Integration of on- and off-airport transport plans – it is critical that airports, especially Sydney Airport, are supported by efficient and effective land-side transport options. Connections currently to Sydney Airport fall far short of global standards for a major international airport in relation to trains, buses and cars. This aspect of operations certainly needs to be covered in airport planning processes. It is also important to consider the needs of airport workers in transport planning, many of whom reside in the southern Sydney region, are currently charged high rail

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fares if they travel by train as a result of the levy, and who often need to travel at non-peak times.

In the southern Sydney region we are also expecting significant increases in rail and road freight as a result of expansion at Port Botany's Container Terminals. This will undoubtedly exacerbate the problems of road and rail congestion in the next few years, and highlights the import and increasingly urgent need for a more integrated approach to transport planning.

3. Alignment of Airport Environment Strategy with Airport Master Plans – incorporating the environmental strategy into the master plan should serve to put environmental considerations on a par with economic and social issues, and would represent an improvement to the current process. The scope of the environmental issues should also be subject to review as part of the process, to ensure that there are no serious omissions: for example, the recent draft Sydney Airport environment strategy did not appear to cover the impact of sea level rise, which would seem to be a major threat in the future. Noise considerations should also be covered (see separate point below).
4. Controls on non-aviation development within Airports – where there is development at an airport that is not related its core business of aviation, then the development needs to be considered within the broader context of the local area. Local planning authorities need to be informed of such development and given the opportunity to seek more detailed information, and where a potential conflict or synergy is identified, the chance to work to resolve the issues with the relevant stakeholders.
5. Controls on aviation-related development within Airports – aviation-related development is obviously the core of the master-planning process, and some such development does occur within the boundaries of an airport without significant impact beyond them. However, where airports are located close to developed areas as Sydney and Bankstown Airports are, almost all development will have some impact on the locality. Better consultation that includes advising stakeholders of on-airport aviation-development would alleviate concerns about developments that will have no or very little impact, and would improve relations between stakeholders. Where this type of development will have impacts beyond the airport itself, such a generating noise or traffic during construction works, broader consultation should occur and should be responsive to concerns.

SSROC is not generally supportive of the possibility of lessee companies gaining exemption from the major development plan process for aeronautical-related developments does not seem to be appropriate, since these developments might have serious impacts on the locality. Rather, the process should allow for a rapid assessment of impacts, and if it is considered that they would be confined to the airport site then an appropriate form of conditional approval should be given.

6. Noise issues – with much of our region directly under the flight paths of aircraft arriving and departing, aircraft noise is a major issue. From the perspective of residents, aircraft noise is endured in conjunction with noise from major roads that service the traffic generated by the airports, trucks and freight trains from Port Botany, and the noise associated with commercial and industrial activity around the Airport/Port Precinct.

Compounding the issue of noise in our region is that many of our residents work shift-work at either the Airport, Port or at major hospitals and as a result have irregular sleep patterns. The impact of noise on issues such as sleep and productivity is contentious, with some studies indicating risk to individual, social and economic development. The management and abatement of noise is therefore of considerable interest to our member Councils.

We would therefore recommend that all airport planning processes include consideration of noise impacts on the local community, and that this impact assessment should be made from the perspective of the residents' actual experience.

The recommended option C with its regulatory change and improved integration of on- and off-airport planning would be an improvement on the current process. However, it would depend heavily upon the Planning

Coordination Forum and the Community Aviation Consultation Groups operating effectively from the perspective of all stakeholders. This means permitting actual participation in planning processes by the stakeholders, and not simply a forum in which local residents and planning authorities can raise concerns that are noted but not influential. Provision of information by lessee companies as highlighted in the explanatory memorandum would be critical; modifying plans in response to issues raised during consultation would be equally critical.

The Planning Coordination Forum as put forward would provide a high-level forum for discussion and would be a positive change. However, on the basis of information provided to SSROC, it would not “ensure that planning decisions taken by airports are better integration planning objectives of State, Territory and local governments ...”: changes to relevant planning processes at each level of government would, and should, be required to ensure better integration. Similarly, there is no guarantee that local governments would be able to influence airport plans.

In conclusion, I would emphasise the need for the planning process to support the principles of sustainable development and put social and environmental considerations on a par with economics. This implies real participation by all key stakeholders in the process, facilitated by the governance framework.

Thank you for the opportunity to present this submission and I trust you will find these comments useful.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'D. Lewis'.

David Lewis  
General Manager  
Southern Sydney Regional Organisation of Councils