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Re. Review of Sydney Airport Demand Management - submission by Inner West Council

Thank you for the opportunity to provide input into the Department's Sydney Airport Demand Management Discussion Paper. Thank you, too, for providing the opportunity to speak directly with Peter Harris [REDACTED] regarding the Discussion Paper.

Council is well aware of the importance of the aviation industry to the Sydney Region, and Australia as a whole. We continue to work closely with the Sydney Airport Corporation Limited, the Department of Infrastructure and other stakeholders in an effort to ensure an efficient and balanced approach to aviation in Sydney Region is achieved. It has long been recognised that the proximity of the Inner West Council to Sydney Airport subjects its community to significant noise and traffic generated by the Airport and Council appreciates the Government's step by step approach in reviewing issues associated with the Airport; in this case the provision of a discussion paper prior to progressing the Demand Management Review.

In the mid-1990s, in response to the growing number of aircraft movements at Sydney Airport and associated noise impacts, the Government established:

- a curfew (between 11pm and 6am);
- a movement cap of 80 aircraft movements per hour during non-curfew times;
- a Long-Term Operating Plan (LTOP) to assist in the equitable geographic distribution of aircraft movements, and hence noise.

Council's opinion is that these measures should continue to remain in force, and it is appreciated that the Federal Government has committed to these aspects remaining outside the scope of the Demand Management Review. Concern is however expressed that that the Discussion Paper refers to an examination of:

"... the legislation and its implementation including the movement cap"

Consequently, Council is compelled to restate its position that the curfew, cap and LTOP should remain unchanged. Further, general concern is expressed that while the Discussion Paper prompts consideration of many specific questions, insufficient detail has been provided to accurately assess the likely impacts of some operational options (eg the likely aircraft noise implications of altering the *rolling hour* cap, to a cap assessed once each hour).

That said, Council appreciates the opportunity to comment on some of the key questions posed in the Discussion Paper, relevant to the Inner West Community, and prefaces these answers with the caveat that any changes should at the very least maintain the existing level of protection for adjacent communities, and ideally, improve conditions for these communities.

Responses to questions specifically relevant to Inner West Council

Question A - How would changes to the definition of a regulated hour (i.e. removing the rolling hour) impact stakeholders?

Council does not feel that sufficient information is available to determine the impact that a change in the definition of the regulated hour would have on its community. Consequently, Council requests that the following be addressed prior to making any decision on changing the definition of a regulated hour.

- Presently the *rolling hour* permits a maximum of 20 movements in each 15 minute period – in order to assess the implications of any change to this it is essential to know the maximum number of movements that could be accommodated within a single 15, 30 and 45 minute period if the regulated hour was changed to a standard 60 minutes;
- Secondly, to adequately assess the impacts of such a change, it is essential to understand the likely changes to noise experienced by adjacent communities (including but not limited to both short and long term ANEFs) should such maximum numbers of movements be achieved.

Council's position is that, should the noise impacts be greater, through the potential for an increased number of movements concentrated into a shorter time rather than evenly spread across 60 minutes, then any change to the *rolling hour* would be unacceptable.

Should sufficient evidence be provided to show that a modification to the regulated hour would significantly assist the aviation sector in recovering from one off/emergency situations (such as major storm events) and that it could be demonstrated that the impacts on the community would be minor and short lived, Council would consider assisting Sydney Airport and the Department in developing a suitable response plan for such situations.

Question B - Should any flights be excluded from the movement cap, while still providing a net benefit to the community? What impacts would this have?

Council considers that, under normal circumstances, no flights should be excluded from the movement cap other than those already provided exemptions under the legislation (eg emergency circumstances). This position is taken because the movement caps were calculated to achieve a balance between operation and environmental considerations with a view to maintaining the liveability of communities under the flight paths, and as such have generally been accepted by all stakeholders for the past three decades.

It is therefore considered that any alterations should at least maintain existing noise levels or, ideally, result in improved conditions for adjacent communities.

Questions N and O

(Question N) - How significant is the impact of implementing a bespoke slot scheme for Sydney Airport? Is there reason to implement a slot management scheme that is substantially different from the WASG? What challenges do inconsistencies between the WASG and Legislation create?
(Question O) - What risks and opportunities could be realised by adopting the WASG?

Council considers that the slot management system currently operating for Sydney Airport was designed in recognition of its unique location in proximity to the CBD, residential communities and Botany Bay and as such that it is not relevant to compare Sydney Airport with other major Australian Airports.

The current slot management system, when applied in conjunction with Sydney Airport's movement caps, curfew and LTOP, has assisted in protecting adjacent communities and while the affected communities would prefer reduced noise impacts from aircraft overflight, it has generally been considered that the combination of these four movement management systems has afforded protection to these communities.

It is consequently considered that any change to these systems must be examined in the light of impacts on the adjacent communities and should at the very least retain their existing levels of protection, but ideally afford improved conditions to these communities.

Question S - Should the 'size of aircraft' rule be retained? If so, what rationale or application criteria should be used?

In relation to slot management including use of the "size of aircraft" rule, Council considers that, as slot management is both a capacity and noise/management tool, potential may exist to also apply consideration of the airborne noise emission of the aircraft type to movement coordination, in an effort to better manage noise impacts on adjacent communities.

Questions AA, BB and DD

(Question AA) - Does the current definition of a slot (and associated terms and processes) in the Legislation ensure the most efficient use of the infrastructure and implementation of the movement cap?

(Question BB) - What opportunities and risks could arise from closer alignment to the WASG inferred approach to slot coordination (i.e. a single entity to make slot allocations which reflect all airport capacity factors)?

(Question DD) - Should there be a legislated framework for handling influxes of returned slots due to significant industry disruptions?

Council requests that any alterations to the definition (or operational application) of a "slot" ensures that there is no change to the existing movement caps and curfew. Further, should the definition of a *regulated hour* be altered, the likely noise implications associated with any change to the definition (or application) of a "slot" should be examined.

Questions FF, GG and HH

(Question FF) - Given the unpredictable recovery period, should further measures relating to slot allocations be considered in response to COVID-19? What are reasonable indicators for further support in response to the COVID-19 pandemic?

(Question GG) - Which option, option variant or alternate approach is reasonable? Please provide your rationale.

(Question HH) - If further interim measures are implemented in response to COVID-19, should they only apply to peak period slots?

Council recognises the need to adapt to the rapidly changing demands on the aviation industry due to COVID-19 and requests that while accommodating these needs, the well-being of the Inner West Community continue to be considered. To that end, Council seeks assurance that:

- Curfew exemptions will be kept to a minimum;
- the existing movement cap, curfew and LTOP will be adhered to;
- the decision-making process will be publicly transparent; and
- any changes deemed essential in response to COVID-19 will only remain in-place while the existing COVID-19 situation necessitates.

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