

// May 2012

Mr Chris King
Metropolitan and Regional Projects South
Department of Planning and Infrastructure
GPO Box 39
Sydney NSW 2001

Email: chris.king@planning.nsw.gov.au



Dear Mr King

Re: Exhibition of Project Application for Rozelle Village/Balmain Leagues Development off Victoria Road, Rozelle (MP11_0015)

Thank you for the opportunity to make a submission concerning the proposed Rozelle Village development.

Our interest in the proposed development relates to aviation safety and the need to protect the airspace around Sydney Airport.

For the purposes of the *Airports Act 1996*, the proposed development is a controlled activity. It is noted that Sydney Airport is yet to receive a formal application for approval to carry out a controlled activity from the proponent as required by regulations 7(2) and 9 of the *Airports (Airspace Protection) Regulations 1996*. If and when such an application is received, Sydney Airport is required to refer it to, and invite submissions from, the Civil Aviation Safety Authority, Airservices Australia, Leichhardt Council and various airlines. That said, Sydney Airport is pleased to make a submission to the NSW Department of Planning and Infrastructure at this stage of the process.

Background

International standards have been adopted which define two sets of invisible surfaces above the ground around an airport. The airspace above these surfaces forms the airport's protected airspace. These two surfaces are the:

- Obstacle Limitation Surface (OLS); and
- Procedures for Air Navigational Services-Aircraft Operations (PANS-OPS) surface.

The OLS is generally the lowest surface and is designed to provide protection for aircraft flying into or out of the airport when the pilot is flying by sight. The PANS-OPS surface is generally above the OLS and is designed to safeguard an aircraft from collision with obstacles when the aircraft's flight may be guided solely by instruments, such as in conditions of little or no visibility. For obvious safety reasons, in such circumstances, pilots must be assured of obstacle clearance.

Tall buildings and other obstacles in the vicinity of an airport or a flight path leading to or from an airport therefore have the potential to create hazards in the airspace and can seriously limit the safety of aviation operations into and out of the airport. The most critical areas of concern are the immediate approach and take-off areas, though obstacles further afield (such as multi-storey towers) can also cause problems.

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Impacts associated with the Rozelle Village development

The site of the proposed Rozelle Village development is around 200 metres to the east of the busy flight path used by aircraft approaching Sydney Airport from the north to land on Runway 16L. During 2011, this flight path was used by around 24,100 aircraft or an average of 66 per day. By 2029, it is forecast that it will be used by more than 42,000 aircraft or 115 per day. Aircraft departing from Runway 34L or arriving on Runway 16R use a flight path one kilometre further west and would also be affected by the proposed development.

At a maximum height of 180 metres AHD, the proposed building would penetrate the OLS by around 24 metres. The PANS-OPS surface would also be penetrated, though to a lesser extent and in a more complicated manner. It is understood Airservices Australia has provided the proponent with more detailed information on issues relating to the PANS-OPS surface.

Conclusion

The proponent commenced consulting Sydney Airport about airspace protection-related issues in late 2011. At that time, and in subsequent discussions, the proponent was advised that Sydney Airport does not support development proposals that penetrate the airport's protected airspace and, in particular, those that penetrate the PANS-OPS surface. As Sydney Airport's approved *Master Plan 2009* makes clear, this surface "...should not be infringed in any circumstances." It is also understood that the Commonwealth Department of Infrastructure and Transport has advised the proponent that any proposal to amend the PANS-OPS surface – that is, changing it to a height that would ensure the proposed building did not penetrate it – would not be supported. Despite being so advised, the proponent has nevertheless decided to continue pursuing the application in its current form.

Given the need to ensure aviation safety, and as the proposed development would infringe Sydney Airport's protected airspace, the construction of a building to this height is not supported. Sydney Airport would similarly not support a proposal to amend the OLS and PANS-OPS surface to accommodate a building of this height. A building of a lesser height that did not infringe the protected airspace would not raise these concerns.

If you would like any further information, please contact Sydney Airport's Manager Government and Community Relations, Mr Ted Plummer, on 9667 6182.

Yours sincerely



Kerrie Mather
Chief Executive Officer