Sydney Airport

23 June 2016

The Project Manager
Sydney Metro City and Southwest
PO Box K659
Haymarket NSW 1240

Via email: sydneymetro@transport.nsw.gov.au

Dear Sir/ Madam,

Re: Response to Sydney Metro Environmental Impact Statement

Thank you for the opportunity to comment on the Environmental Impact Statement (EIS) regarding the Chatswood to Sydenham component of the Sydney Metro City and Southwest project.

Sydney Airport welcomes the development of the Sydney Metro as a means to improve public transport connectivity throughout large parts of Sydney. A new metro system will support passengers and employees travelling to the airport faster, will help reduce road traffic congestion, and will make it easier for tourists and other visitors to move around Sydney.

The urban renewal projects made possible by the metro are also supported, as they increase the quantity and diversity of housing close to the city, while growing the number of job opportunities in Sydney. We see these projects as serving to further enhance Sydney as a great place to live, work and visit, by providing new public spaces for the community to enjoy, with increased access to education, transport and cultural activities.

While beyond the scope of this EIS, we note that consideration is being given to extending the metro beyond Bankstown to connect with Liverpool, and then possibly with the future Western Sydney Airport (WSA). Connectivity with the new airport by rail is critical to ensuring its success.

We are keen to ensure that aviation related issues are considered early in the planning process rather than, as sometimes occurs, at the very end of the process after decisions have been made and important elements of the project have been finalised. Once that occurs, the landowners' expectations concerning development potential are often already set.

Prescribed Airspace

In particular, as we have raised in a number of previous submissions to the State Government, it is of vital importance that new developments around the proposed new stations, particularly at Waterloo and Sydenham, do not compromise aviation safety or reduce the efficiency of Sydney Airport by intruding into its prescribed airspace.

Given the location of the land in question relative to Sydney Airport, it would appear that the Obstacle Limitation Surface (OLS), the Procedures for Air Navigation Services – Aircraft

Operations (PANS-OPS) surfaces and the Precision Approach Path Indicator (PAPI) system surfaces are the relevant components of Sydney Airport's prescribed airspace. Airlines may also have developed what are called "engine out (emergency) procedures" that may also be relevant and would also need to be taken into account.

The charts that collectively comprise Sydney Airport's prescribed airspace can be found at: https://www.sydneyairport.com.au/corporate/community-environment-and-planning/planning/airspace-protection.aspx.

While the future development of land around new stations in general would need to have regard to airspace-related issues, the redevelopment of the area around the proposed Waterloo Station in particular is very likely to be affected. Consideration should also be given to the temporary impact on prescribed airspace of cranes and other construction equipment at the Waterloo Station and around the Marrickville dive site.

At the site around the proposed Waterloo Station, the OLS varies between 60 and 70 metres above sea level (AHD), while the PAPI and PANS-OPS surfaces are located at or around 125 metres. Therefore if the buildings constructed as part of the urban redevelopment of this area are built to this maximum height, they may penetrate the OLS.

We also note that at the Marrickville dive site, which is much closer to the airport, the OLS varies between 30 and 50 metres AHD, with the PAPI and PANS-OPS surfaces located at around 40 to 50 metres AHD. This same issue would apply to any construction equipment, such as a crane that could potentially intrude into this protected airspace, even if only temporarily. In the case of the Marrickville dive site, this issue is especially vital, as the proposed works site is located under the extended centre line of Sydney Airport's main north south runway (ie. directly in line with the runway on final approach for aircraft landing from the north or aircraft taking off to the north.)

While a structure (including a building or crane) that penetrates the OLS is not automatically prohibited, approval from the Department of Infrastructure and Regional Development is required. However, permanent intrusions of PANS-OPS are prohibited by Commonwealth law. Sydney Airport's website outlines the assessment process in more detail

We would be pleased to provide you with more definitive advice in the future concerning these proposed building height limits, and work with you to reach a positive resolution to the benefit of this proposal.

Future Employment Lands

Another issue of importance when considering the development of land around stations is the protection of employment lands.

As Sydney Airport and Port Botany both continue to grow, an adequate supply of industrially zoned employment lands in close proximity to the airport and port will be vital to ensuring the full economic and employment benefits of such developments are realised. This will rely on zoning determinations, and particularly the maintenance of existing industrial zoned lands.

While we acknowledge the importance of boosting Sydney's housing supply, it is important that the rezoning of industrially-zoned land in close proximity to the airport, and in particular to the north of the airport, be undertaken in a coordinated manner with proper regard to the strategic planning implications. To this end, we have urged the Greater Sydney Commission to

recognise within relevant district plans that an adequate stock of appropriately zoned employment lands in the vicinity of Sydney Airport must be protected to facilitate the airport's ongoing operation and long term growth.

Traffic Impact of Construction

The EIS discusses the impact of increased construction vehicles upon local traffic at each of the work sites. Of particular interest to us are the Waterloo Station and Marrickville dive sites, which are sufficiently close to the airport that the increased traffic for each could impact on traffic heading to the airport.

In particular, we note that the southern haul route from the Waterloo Station site follows Botany Road and passes through the interchange with Mill Pond Road, Southern Cross Drive and General Holmes Drive. As you would be aware, this is a critical intersection for traffic approaching the airport. While the modelling in the EIS suggests that the impact on traffic could be minimal or even beneficial, there will nevertheless be an increase in the number of heavy vehicles on these roads at a time that coincides with the morning peak of traffic heading to the airport.

Therefore, Sydney Airport would like to request that project managers and representatives of the Roads and Maritime Services (RMS) liaise closely with the Ground Transport team at the airport throughout construction of the metro to ensure these impacts are minimised and can be well communicated to stakeholders.

Notwithstanding the modelling included in the EIS, we nevertheless place great priority on our passengers and employees being able to get to the airport quickly and efficiently. With the Sydney Gateway component of the WestConnex project at the planning phase, and current works either underway or in planning to upgrade roads around the airport, it is vitally important that access to the airport is not adversely impacted by this project. We are hopeful that this can be mitigated with careful planning and communication.

Thank you once again for the opportunity to comment on the EIS for this component of the Sydney Metro. If you would like further information, please feel free to contact Sydney Airport's Manager, Government Relations and Major Projects, Mr Robin Schuck, on (02) 9667 9288.

Yours sincerely

Kerrie Mather
Managing Director and Chief Executive Officer