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Aviation White Paper
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20 December 2023

Dear Sir / Madam,

NSW Ports Submission to the Aviation Green Paper: Towards 2050

NSW Ports welcomes the opportunity to provide a submission to the Australian Government regarding the Aviation Green Paper: Towards 2050 (the Green Paper). NSW Ports is responsible for managing the port and freight assets of Port Botany, Port Kembla, the Cooks River Intermodal Terminal, and the Enfield Intermodal Logistics Centre. At NSW Ports, our focus is managing the key trade gateways connecting the people and businesses of NSW and Australia to global markets. Our Port Botany and Cooks River assets are in close proximity to Sydney Airport.

This submission provides the below recommendations:

1. Maintain and / or implement consultation requirements for all developments on airport land to ensure community and adjoining user expectations are met.
2. To address the encroachment of incompatible land uses affecting freight corridors and facilities, strengthen the role of the National Urban Freight Planning Principles by ensuring they are embedded in local, state, and federal planning practices.
3. New, or changes to, regulations or guidelines, need to consider their impact on the future operation and development of surrounding users and have a requirement to mitigate or avoid such impacts.
4. Greater accessibility to the existing fuel pipeline connecting Port Botany to Sydney Airport, and/or delivery of new pipeline capacity, would increase fuel supply alternatives and reduce fuel trucks on roads.
5. Identify and protect corridors for fuel pipelines to Western Sydney Airport from Port Botany / Port Kembla, to enable safe and cost-effective transport of fuel in large quantities and reduce fuel trucks on roads.

Airport land use planning and consultation mechanisms

NSW Ports (and its predecessors) has a long-established engagement with Sydney Airport with regard to Master Plan processes and Major Development Proposals. This engagement has included formal and informal consultation processes to ensure both international gateways are able to operate within the same region of Sydney as productively as possible. Critically, Port Botany and Sydney Airport share key road access infrastructure and also airspace surrounding the airport of both our nationally significant assets.

The Green Paper notes:

“Where non-aviation development like a warehouse or office block on an airport site is undertaken and otherwise has limited impact on the surrounding community, interest from the community can be very limited. This suggests different levels of community consultation may be needed for different kinds of developments. Canberra Airport received no submissions at all on a 2021 MDP for an office development.”

NSW Ports cautions against any threshold for consultation that is limited to acoustic impacts or that is inconsistent with local planning requirements. Consultation forms a critical part of ensuring that land use conflicts are resolved early and in collaboration prior to any broader impacts being felt. There is a key need for existing consultation requirements to remain in place. The Canberra precedent of the development of an office may not attract submissions in that case, however could have much more significant impact within a different airport context.

The exhibition of information and assessments commensurate with local planning requirements are important to allow NSW Ports to understand the potential impacts of an on-airport development and participate in the development process. All airports in Australia operate within different environs and consultation requirements need to recognise this.

Recommended Action: Maintain and / or implement consultation requirements for all development on airport land to ensure community and adjoining user expectations are met.

With regard to land use conflict, the Green Paper notes:

Encroachment of incompatible land uses affecting contemporary and future freight corridors and facilities, including airports, may impact the efficiency and round the clock movement of freight, by leading to the calls for operating restrictions. There are challenges in aligning land-use planning across jurisdictions to ensure the preservation of freight networks, including different planning frameworks and priorities.

NSW Ports notes that through the National Freight and Supply Chain Strategy, the Federal Government has published the National Urban Freight Planning Principles. As we have advocated for in our submission to the National Freight and Supply Chain review, this set of Principles provide some excellent guidance, however there is little awareness or regulatory requirement for them to be adopted. These Principles should be embedded in planning frameworks across the country to assist with improving the productivity and efficiency of supply chains more broadly. The National Urban Freight Planning Principles directly address the challenge that is identified in the Green Paper around the differing planning frameworks and priorities.

The Commonwealth has previously adopted a similar approach to develop a nationally consistent planning framework through development of the National Airports Safeguarding Advisory Group (NASAG) national land use planning regime near airports and under flight paths. By having the states endorse and implement a set of guidelines focussed on consistent noise and building standards near airports, the NASAG framework has delivered both improved amenity for residents in close proximity to airport whilst also providing certainty to land developers and ensuring business operations around airports are consistent and well understood nationally.

Recommended Action: To address the encroachment of incompatible land uses affecting freight corridors and facilities, strengthen the role of the National Urban Freight Planning Principles by driving their adoption at local, state, and federal level.

Airspace planning, regulation and management

The Commonwealth provides regulations and guidance for safe aviation operations through airspace planning and management. As a significant asset in close proximity to Sydney Airport, Port Botany is subject to regulation related to protection of the prescribed airspace, and some of our permanent intrusions into the prescribed airspace (such as quay cranes) are critical to the ongoing efficiency of the Port.

NSW Ports has worked effectively with both Sydney Airport and the Civil Aviation Safety Authority in managing the interaction between our assets. However, over time we have found increasing restrictions and requirements imposed on our operations due to our proximity to Sydney Airport.

The introduction or amendment of regulations and guidelines related to prescribed airspace can have a significant impact on our operations and as such, any changes should have consultation requirements with a consideration of the future operational needs of other parties. Prioritisation of airspace usage should not automatically be given to an airport without a full understanding of the economic impacts to adjoining users.

Recommended Action: New, or changes to, regulations or guidelines need to consider their impact on the future operation and development of surrounding users and have a requirement to mitigate or avoid such impacts.

Aviation fuel supply

As a key national import terminal for refined petroleum products, Port Botany handles one-third of NSW's fuel supply. Port Botany handles some aviation fuel, the volume of which is constrained by limited accessibility to the existing fuel pipeline to Sydney Airport.

Greater accessibility to the existing fuel supply network, which is subject to access issues and / or pipeline capacity constraints to Sydney Airport, and/or delivery of new pipeline capacity would enable additional fuel transport by pipeline, reducing the number of trucks required to transport the fuel.

Recommended Action: Greater accessibility to the existing fuel pipeline connecting Port Botany to Sydney Airport, and/or delivery of new pipeline capacity, would increase fuel supply alternatives and reduce fuel trucks on roads.

Western Sydney Airport (WSA) is expected to open by 2026. At full operational capacity, the airport could require 50 to 65 B-double tanker deliveries per day¹, which would add to Sydney's road congestion. The opportunity for a dedicated fuel pipeline to WSA from Port Botany would enable safe and cost-effective transportation of fuel in large quantities to WSA and would reduce fuel trucks on roads.

Additionally, there is the potential for Port Kembla to supply fuel to WSA. A potential pipeline route from Port Kembla to WSA would be able to utilise existing corridors, minimising the need to traverse residential areas.

In 2018, Deloitte prepared the *Western Sydney Airport Aviation Fuel Supply Corridor Options Report* for the then Department of Infrastructure, Regional Development, and Cities at the request of the Commonwealth through Conditions of the Western Sydney Airport Plan². Noting that they are not mutually exclusive, the options presented in that paper are:

- PP1 — includes an existing pipeline from a port in eastern Sydney to a central Sydney terminal where jet fuel is treated and stored, and then a new pipeline (40km) to WSA
- PP2 — includes an existing pipeline from a port in eastern Sydney to a western Sydney depot, where a new intermediate storage facility would be constructed to pump jet fuel via a new pipeline (25km) to WSA
- P1 — includes a new pipeline (60km) from the Botany Bay terminal to WSA and a new pumping facility

Utilising the existing import and storage infrastructure at Port Botany can be part of any or all of the above options.

Recommended Action: Identify and protect corridors for fuel pipelines to Western Sydney Airport from Port Botany / Port Kembla, to enable safe and cost-effective transport of fuel in large quantities and reduce fuel trucks on roads.

The Green Paper recognises that sustainable aviation fuel provides one of the main levers in the immediate and longer term to reduce aviation emissions. NSW Ports has identified that the broader changing of fuel needs towards a decarbonised future could require the adaptive reuse of existing port infrastructure for sustainable fuel handling and storage. The transition to sustainable aviation fuel will not negate the need for enhanced port connectivity (as even domestic production may require transport by ship to NSW) and the above Actions will ensure this transition is able to be facilitated as we move away from fossil fuels.

NSW Ports would welcome the opportunity to engage further and looks forward to the release of the Aviation White Paper following consideration of this review. If you have any questions please contact me at Greg.Walls@nswports.com.au or on 0498 877 088.

Yours sincerely,



Greg Walls
Public Policy and Planning Manager
NSW Ports

¹ Infrastructure Australia. *Early stage proposal for corridor preservation for Western Sydney Airport fuel pipeline*. Available at: <https://www.infrastructureaustralia.gov.au/map/corridor-preservation-western-sydney-airport-fuel-pipeline>

² Deloitte. *Western Sydney Airport Aviation Fuel Supply Corridor Options Report* Prepared for the Department of Infrastructure, Regional Development and Cities. February 2018. Available at: https://www.westernsydneyairport.gov.au/sites/default/files/Fuel_Supply_Corridor_Options_Report_Feb2018.pdf.