

30 July 2006

The Airport Manager  
Sunshine Coast Airport  
Friendship Avenue  
Marcoola Qld 4564

Dear Sir

**Draft Master Plan for Sunshine Coast Airport (February 2006) – Public Consultation**

The Twin Waters Residents' Association (TWRA) provides the attached Submission dated 30 July 2006 in response to the request for public comment on the Sunshine Coast Airport Preliminary Draft Master Plan February 2006. The TWRA's response is provided on behalf of the members of the Twin Waters community.

Briefly, the TWRA considers that this draft Master Plan should be revised:

- A new Master Plan should be prepared which provides a clear vision for the future role of Sunshine Coast Airport.
- There should be an immediate priority on the planning and development of the East / West runway.
- The proposal for the extension of the existing North / South runway by 200 metres to the north should be abandoned.

While these are the highest priority issues for TWRA in its submission, further issues are also included in the submission for reconsideration.

The TWRA has consulted very widely in the Twin Waters community before finalising this submission. Actions have included:

- Discussion at the TWRA regular meeting, including a presentation from the Airport Manager on 7 July;
- Item in Newsletter delivered to all residents informing them of the public consultation and providing relevant links;
- Committee established to canvas views and prepare draft response
- Draft response posted on TWRA web site to allow for further review and comments from residents
- Broadcast e-mail to residents informing them of web site information and encouraging their responses

The TWRA submission reflects the very widely held views of the residents of Twin Waters. This is a substantial submission and response from a large and relevant stakeholder group in the future planning of the Sunshine Coast Airport.

Thank you for the opportunity to provide our submission. We would be pleased to provide further comments in elaboration of our views if required.

Yours faithfully

Warwick Daniels  
President

Geoff Billard  
Vice President

## **Submission on Behalf of Twin Waters Residents' Association in Response to Draft Master Plan for Sunshine Coast Airport**

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This submission regarding the Draft Master Plan for Sunshine Coast Airport dated February 2006 is provided by the Twin Waters Residents' Association Inc (TWRA) on behalf of the members of the Twin Waters community.

The TWRA has reviewed the draft Master Plan in detail. This response provides comments on the draft Master Plan at three levels – at an overarching or strategic level; at a level dealing with the specifics of the document released and also at a level relating to the process followed for the review of the draft Master Plan. At all three levels, the TWRA has identified significant deficiencies with the present document that cause the TWRA to call for the document to be revised.

In brief, the TWRA considers that this draft Master Plan should be revised:

- A new Master Plan should be prepared which provides a clear vision for the future role of Sunshine Coast Airport.
- There should be an immediate priority on the planning and development of the East / West runway.
- The proposal for the extension of the existing North / South runway by 200 metres to the north should be abandoned.

These are the highest priority issues proposed by TWRA. Further issues are highlighted in the submission below.

### **1. A Vision for Sunshine Coast Airport is Needed**

***TWRA considers that the Sunshine Coast Airport should have a clear and simple vision – meet the tourist / business needs for the Sunshine Coast while minimizing adverse impacts.***

The TWRA considers that the draft Master Plan does not disclose a clear vision for the Sunshine Coast Airport. The TWRA considers that the vision for the airport should be:

- To meet and foster the tourist and business needs of the Sunshine Coast; and
- To minimize adverse impacts on Sunshine Coast residents

This vision should be a key element of the plan, with the master plan then examining the options to achieve that vision. The vision for Sunshine Coast Airport should be debated by the airport's stakeholders, especially its owners – the Maroochy Shire Council (MSC) on behalf of the residents of Maroochy Shire. The vision should be a key part of the context provided to the Airport Management (through the board) to provide the guidance required for the development of the airport master plan.

The TWRA wishes to highlight two aspects of this vision for the airport. First, it contains two key themes – meeting tourist and business needs for the Sunshine Coast and minimizing adverse impacts. Both are important and directive about the options for consideration by Airport Management as part of the master planning process. Second, it does not make any statement about commercial objectives as part of the vision. This is an important point which should be explained further.

Maroochy Shire Council's ownership of the airport (on behalf of the residents) enables it to consider and balance all aspects of airport ownership and operation, including the impacts on residents. Profit or net present value maximization should not be core drivers for the airport. The airport was established by the MSC to meet local needs and, although times and the scale of operations have changed, the community requirements have not – meet

needs and minimize impacts. The organizational change to establish the airport as a business unit simply increases the importance of the MSC ensuring that its directives to airport management through the board are consistent with its original objectives for the airport.

## **2. The Draft Master Plan Lacks Vision**

Because there is no vision stated in the draft Master Plan, there is no clarity about where the plan is headed i.e. the goals or objectives are not clear. This is a significant deficiency.

The draft Master Plan appears to have a number of objectives, including

- to respond to forecast passenger growth
- to foster expanded airport business growth
- to minimize capital expenditure
- to maximize financial returns
- to meet regulatory requirements (environmental etc)

It is noteworthy that there is no stated objective to minimize adverse impacts on residents, especially those residents of Marcoola in the Public Safety Zone.

Good planning process involves development of clear goals or objectives and then analysis of options to achieve those clear goals or objectives. If the draft Master Plan had been developed with objectives aligned to the TWRA's proposed vision stated above, the outcome would have been quite different. In particular, it would result in a proposed Master Plan that would include earliest development of the East / West runway as the only option that will allow growth for the airport to meet forecast needs and with a safe runway (wider and longer) that would allow maximum use of landings and take-offs from over water, thus minimizing adverse noise and risks for residents in the region of the airport.

## **3. The Basis for Decisions about Options is not Clear**

***The TWRA proposes that the basis for options analysis and recommendation be specified in the Master Plan for public consultation and specifically that the social costs (and benefits) of options be explicitly considered in the analysis.***

The draft Master Plan includes some options, such as the three options to extend the existing runway. However, the basis for decisions about which option to adopt is not clear. While it would not be expected that options should be subjected to a full cost – benefit analysis, there should be some broad brush evaluation of costs and benefits so that there can be some transparency about the basis for decisions.

More importantly, that cost – benefit analysis should include some consideration of the social costs involved. Clearly, an option that involves a 200 metre extension of the runway north and closer to existing residential housing has some significant social costs. If such costs have not been factored in, the analysis is flawed and the wrong option could be selected. While it can be argued that estimating the social costs is subjective and difficult, there is no question that ignoring them is a fatal weakness in any options analysis. Failure to consider the social costs in a transparent manner reduces the relevance of public consultation and public confidence that the options analysis for the plan is comprehensive.

## **4. The East / West Runway Alignment Requires Review**

***The TWRA recommends that the alignment of the East / West runway be re-examined.***

As part of the revision of the Master Plan, the TWRA proposes that the alignment of the East / West runway be reviewed. This review should consider whether there are possible alternative alignments that would place no residential properties within a Public Safety Zone and also whether the approach / take-off zone could be more over the ocean. An alignment starting closer to the northern end of the existing North / South runway would appear worthy of examination. It is considered that the existing alignment of the Sunshine Motorway should not be considered a constraint in the examination of options for alignment of the East / West runway. The relocation of a small section of the Motorway would simply be part of the development cost of the East / West runway.

## **5. Passenger Forecasts Appear Conservative**

***The TWRA considers that the passenger forecasts are too conservative and should be revised upwards.***

It is understood that passenger numbers are currently well above the 700,000 per annum rate and that Sunshine Coast Airport has the highest growth rate of any airport in Australia. However, the draft Master Plan predicts a marked slowing of passenger growth over the 15 years of the plan. This does not seem logical or reasonable.

There seem good reasons to expect that the recent high growth rates will continue. As the baby boomer generation moves to retirement, living and / or holidaying on the Sunshine Coast is likely to continue to grow. Further, cheap airfares and plenty of very good and reasonably priced accommodation makes a Sunshine Coast weekend break affordable for more Sydney and Melbourne people. This market would seem likely to continue to expand.

If growth rates of the past five years continue, annual passenger numbers could reach 2 million by 2013, some six years earlier than the high case assumed for the draft plan. This would mean that the planning outcomes assumed for this plan would be inadequate to meet demand. At the very least, the "high" case assumed for the plan requires significant revision.

## **6. The draft Master Plan should consider Social Impacts and Mitigation**

***The TWRA recommends that a Social Impact plan be developed as an integral part of the development of the Master Plan for Sunshine Coast Airport.***

The draft Master Plan provided for public review and comment should consider the social impacts and potential mitigation options so that this important dimension of existing and future airport development can be debated in an informed manner. While it is perhaps inevitable that there will be social impacts, there should be the opportunity to consider options and mitigation measures as part of the public debate.

Sunshine Coast Airport's operations have impacted in varying degrees on all residents and businesses from Maroochydore and Buderim in the south to Coolool in the north. This is a large number of people - and the number affected will increase in the coming years. A Master Plan must give some consideration to this. A Social Impact plan as part of the Master Plan would assist to ensure that social impacts (existing and potential) are examined and taken into account as part of the planning process. That plan should include examination of mitigation options. A Social Impact plan would also assist the public debate on the relevant issues.

## **7. Operational Reasons Require an East / West Runway**

***The TWRA strongly supports an East / West runway as an immediate priority for operational and safety reasons.***

The north / south runway is 30 metres wide and does not meet the Australian standard for existing aircraft usage (737s and A320s). It is understood that this runway and its alignment

causes difficulties in some weather conditions. The fact that there is even a proposal to extend the length of the runway indicates that it is inadequate for present requirements.

An East / West runway could be built to meet the Australian standard and provide the required length for all foreseeable aircraft types that might use the airport. It would seem logical to conclude that an East / West runway would provide for much greater operational safety for all users of the airport. It would also provide the opportunity to either have all residential properties removed from the Public Safety Zone or, better still, have the entire Public Safety Zone within the airport boundaries.

## **8. General Aviation Policy and Growth is not Adequately Considered**

***The TWRA considers that issues relating to general aviation require more analysis in the Master Plan.***

At present, general aviation is an important part of the activity at Sunshine Coast Airport. It is also a significant contributor to the adverse social impacts of the airport for those living closest to the airport.

There are a number of issues (existing and emerging) related to general aviation that need to be considered, including:

- noise from some older light aircraft – can this be controlled either directly by regulation or indirectly by airport pricing policy
- frequency of “circuits”, especially in the late afternoon or evening
- possible closure of Caloundra airport and re-location of a reasonable quantum of general aviation to Sunshine Coast airport
- growth of training services, including other activities similar to the Singapore Flying College and also helicopter flying schools
- breaches of the “Fly Friendly” hours and their impact on residents – can a curfew be imposed by the airport (subject to exceptions for emergencies)

These are issues that affect the existing and future amenity of those living in the airport vicinity. They should be addressed as part of the vision for the airport and in the airport Master Plan.

## **9. Funding and Ownership Considerations are not Master Plan Issues**

***The TWRA recommends that consideration of ownership and financing options be deferred and not allowed to distract from the development of the best long term Master Plan for Sunshine Coast Airport.***

During the public consultation period, there has been some discussion about funding and ownership issues, particularly as they relate to the East / West runway. The TWRA considers that these are not Master Plan issues and their discussion has the potential to distract from the central planning issues for the Master Plan.

The TWRA considers that it is critical that a credible, well-researched and considered Master Plan is developed for the Sunshine Coast Airport. This will provide a blueprint for the future.

The ownership of Sunshine Coast Airport is a separate matter on which debate is warranted from time to time. As mentioned above, the MSC’s ownership of the airport on behalf of the residents places an onus on the MSC to duly consider the residents’ interests – an onus that would be more difficult to ensure if the airport was not owned by MSC. Once a clear blueprint for the future is in place in the form of a secured Master Plan, perhaps this is an issue to re-visit, but it is not an issue for now.

Likewise, funding for a major project such as the East / West runway is an issue for consideration once its position in the development hierarchy has been determined. There are many funding options, including some that might be linked to ownership options. Again, this is not an issue for now. The more important immediate requirement is for a quality long term Master Plan. At the appropriate time, a quality Master Plan will assist development of financial options.

## **10. Relocation of the Airport is not a Realistic Option**

***The TWRA does not advocate relocation of the Airport as a solution to the issues raised by the draft Master Plan. This option should be rejected.***

The TWRA has noted comments calling for the relocation of the Airport as a solution to some of the issues raised by the draft Master Plan. Apart from the fact that no specific alternative location has been identified, relocation would require the complete write-off of existing infrastructure at the Sunshine Coast Airport and re-investment in all new infrastructures, such as terminals, taxiways, control tower, access roads, parking facilities and support buildings. The costs would be prohibitive.

TWRA accepts that the existing site is the accepted and intended long-term site for the Airport. The issues arising from the draft Master Plan are only about the priorities and optimum use of the existing Airport site.

The TWRA considers that relocation of the Airport is an unrealistic option and this option should not be pursued. Scarce resources should not be spent in even investigating this option. It should be decisively dealt with as an outcome of this public consultation so that funds are not wasted and unrealistic expectations are not raised. Focus must be maintained on the substantial issues affecting future planning at the existing Airport location.

## **11. Public Consultation on the draft Plan has been Confusing**

***The TWRA notes that the public consultation has been flawed, but the TWRA assumes that all public comments will be properly considered for inclusion in a revised Master Plan.***

The TWRA considers that there have been significant deficiencies in the public consultation process for the draft Master Plan. These have included:

- Confusion about who is the “client” for the public consultation and feedback. The draft Master Plan was released by MSC following its consideration at a scheduled meeting on 6 June. Does this mean that MSC has “supported” the contents of this plan and wants feedback which it (MSC) will consider before deciding whether to formally adopt the existing plan?
- The address for provision of feedback is unclear. The draft Master Plan itself does not provide any address. The Airport web site now provides an address, including via a consultant. The letter to residents dated 8 July provides two different addresses – that for MSC and that for the Airport.
- The brochure “Have your say on the future of Sunshine Coast Airport” is quite misleading. The full page colour photo highlights the “proposed 13.31 runway” but in fact there is no specific provision of the existing draft Master Plan for the runway to be built within the time-frame of the Master Plan. Construction of a new runway is also highlighted as a “Key Area” when there is no such plan.
- The letter to Residents dated 8 July repeats some of the confusing information in the brochure.

The TWRA considers that the public communications have been somewhat haphazard and sub-optimal. However, we will assume that the overall result will be acceptable in that key and relevant stakeholders have been informed and that their views will be given full and

serious consideration. The TWRA's response has been prepared and is submitted in the expectation that this will be the case.

## 12. Conclusion

The TWRA appreciates the opportunity to comment on the draft Master Plan dated February 2006 and, in particular, also expresses its appreciation to the Manager of Sunshine Coast Airport for attending our residents meeting on 10 July.

The TWRA, on behalf of its members and the residents of Twin Waters, submits that the draft Master Plan as provided for public comment has significant deficiencies and requires substantial revision.

The revised plan should include:

- A clear vision statement for Sunshine Coast Airport
  - To meet and foster the tourist and business needs of the Sunshine Coast; and
  - To minimize adverse impacts on Sunshine Coast residents
- An immediate priority for the planning and development of an East / West runway to provide
  - A safe runway which is wider and longer than the existing north / south runway
  - Possible re-alignment to provide for maximized approaches and take-offs over water
  - No residential properties to be included within the prescribed Public Safety Zone
- The proposal to extend the existing main runway by 200 metres to the north to be abandoned
- A "high case" passenger growth forecast based on recent growth rates continuing for at least the next 5 - 7 years
- More consideration to mitigation of the adverse effects of general aviation

The TWRA would be pleased to provide further comments or discussion on its submission if requested.

Submitted on behalf of  
Twin Waters Residents' Association Inc

Warwick Daniels  
President

Geoff Billard  
Vice President

Twin Waters  
30 July 2006