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National Aviation Policy Statement
Department of Infrastructure, Transport,
Regional Development and Local Government
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Dear Sir/Madam

National Aviation Policy Green Paper

Council writes in response to the National Aviation Policy Green Paper and thanks you for the opportunity to provide further comments on this important policy initiative.

The City of Holdfast Bay is a South Australian Local Government Area which shares a boundary with the Adelaide Airport and is therefore directly affected by the operations of the airport. Of particular interest to Council are the issues of 'Planning at Federally Leased Airports' and 'Noise Impacts' which are discussed in Chapters 8 and 10 respectively. The following discussion provides comments on the process and improvement strategies identified in the Green Paper and suggests additional actions and strategies which Council considers warrant further investigation.

Planning at Federal Leased Airports

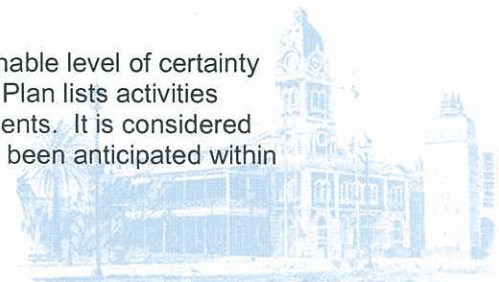
The City of Holdfast Bay recognises that ongoing private investment is critical to the long term financial sustainability of the aviation industry in Australia. Furthermore, it is recognised that continued development of non-aeronautical land uses on airport sites provides opportunities for employment, economic growth, and community access to a wider range of goods and services.

It is agreed that the key to managing the impacts of non-aviation development on surrounding communities is not through increased regulation, but rather, through improved consultation and co-operation between airport operators and state and local governments. As a Local Government authority, we currently enjoy a good working relationship and sound communication with the operators of the Adelaide Airport. However, it is considered that there are several mechanisms by which our community could be provided with more certainty and involvement in the airport planning process. These mechanisms are outlined in the following discussion.

Improving Airport Master Plans

It is considered that improving the airport Master Plan process would contribute greatly to creating a more effective planning regime. In addition to the recommended strategies in the Green Paper, the following points provide further suggestions of how planning at federally leased airports may be better integrated with state and local planning at a broad, strategic level.

- Airport Master Plans should provide the community with a reasonable level of certainty regarding future land uses. The current Adelaide Airport Master Plan lists activities which are either 'complying', 'merit' or 'non-complying' developments. It is considered that a land use that is not mentioned in any of these lists has not been anticipated within



the relevant precinct and should therefore be considered inappropriate and not automatically treated as a 'merit' development.

- All forms of retail development on airport sites have the potential to impact negatively on established centres through increased competition. This is a significant issue if the additional retail development has not been considered in the context of the Metropolitan Planning Strategy, which provides direction from the State Government on land use and development in South Australia over the medium term and is empowered under the Development Act 1993. An Airport Master Plan should, therefore, be required to provide a detailed assessment against the State Planning Strategy to ensure consistency with State strategic directions. Conversely, State Governments should liaise closely with airport operators when formulating strategic plans so that appropriate future development on airport sites can be anticipated at a State level.
- Airport Master Plans should also be consistent with the Development Plans of neighbouring councils, with areas of non-conformity highlighted and appropriately justified.
- Council is supportive of the Commonwealth Minister retaining the final decision making authority for land use planning and development if State and Local Governments are represented on a specialist Panel providing advice to the Commonwealth Minister.

Land Use Planning

Council recognises the importance of continued investment in aeronautical infrastructure at airports. The reality is that this infrastructure is partly funded by revenue from non-aeronautical developments and therefore a mix of land uses on airport sites is an important part of the future of Australia's aviation industry. However, it is important that the mix of on-airport development does not impact negatively on surrounding communities and commercial precincts. Therefore, it is considered that non-aeronautical developments should have regard to the following principles:

- Be of a type of land use that could not reasonably be expected to be accommodated within established or traditional Centres;
- Be of a type of development that can take advantage of the 'rarity of opportunity' that airport land offers in terms of large areas of land under single ownership within close proximity to major domestic and international transport and freight routes; and
- Be of a type of development that has been identified and defined by the airport Master Plan, taking into account State and Local Government centres and retailing strategies.

It is also acknowledged that Local and State Government's also have a responsibility to ensure that off-airport land use planning supports and protects aeronautical activities through the encouragement of compatible land uses, taking into account noise, safety, environmental and economic constraints and opportunities. It is important for airport authorities and Local and State Governments to work collaboratively on a shared strategic vision for airport precincts.

Major Development Plans and Public Consultation

Council is very supportive of the proposed review of the triggers for Major Development Plans, as often community impacts do not necessarily correlate with the value of a development. It is considered that a reasonable set of criteria should be established to give State and Local Governments the ability to appeal to the Commonwealth Minister to 'call-in' the lodgement of a Major Development Plan in instances where a 'significant community impact' can be evidenced.

Often the ability of Council to provide meaningful comments on Major Development Plans is hindered by the lack of detailed information. In order for public consultation on Major Development Plans to be genuine and meaningful, the level of information should match that required in the assessment of an off-airport development. Relevant information and

documents such as detailed plans, specialist reports and impact assessments should be required to accompany all Major Development Plans in order for the public to consider all potential impacts and make informed submissions.

It is considered that in recent years there is a growing level of scepticism within the community regarding the planning process for federal leased airports. To address any actual, or perceived, issues of transparency in the decision making process, and to establish a more robust system of monitoring and enforcement, the following points warrant consideration.

- Provide State and Local Government authorities with the contact details of the 'responsible officer' within the Department of Infrastructure, Transport, Regional Development and Local Government for all Major Development Plans;
- Provide, upon request, a copy of any Decision Notification Forms, including any associated conditions of approval;
- Following the approval of a Major Development Plan, provide, upon request, an independent 'assessment report' which details the reasons for approval;
- Establish an independent judicial review process, whereby third parties may formally raise concerns regarding airport planning processes and outcomes.

Overall, the City of Holdfast Bay is supportive of the recommended strategies that move towards a more effective planning regime for on-airport development.

Noise Impacts

Easy access to clear and concise aviation noise information has been an issue for Council as the ANEF/ANEI system is highly technical and difficult to translate into development policy. Council is therefore highly supportive of the proposal to develop a new noise information framework.

It is agreed that State and Local Governments need to work in partnership with airports to ensure land use planning and zoning is consistent with noise exposure information. This approach will require greater resource support and clear direction from airports when planning schemes are being formulated and revised.

The City of Holdfast Bay thanks the Department of Infrastructure, Transport, Regional Development and Local Government for consideration of the issues raised in our submission. We look forward to the release of a 'National Aviation Policy White Paper' later in 2009 and welcome the opportunity to provide further comments on national aviation policy.

Yours sincerely



Rob Donaldson
CHIEF EXECUTIVE OFFICER



Ken Rollond
MAYOR