

Perth Airports Municipalities Group Inc.

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The Minister
Department of Infrastructure, Transport, Regional Development
& Local Government
GPO Box 594
Canberra ACT 2601

Dear Minister

NATIONAL AVIATION POLICY GREEN PAPER

The Perth Airports Municipalities Group Incorporated (PAMG) is providing comment on behalf of its 10 member local governments i.e. Town of Bassendean, City of Bayswater, City of Belmont, City of Cockburn, City of Gosnells, Shire of Kalamunda, City of Melville, Shire of Mundaring, City of South Perth and City of Swan. Each of our members is impacted either directly or indirectly by airports (Perth and Jandakot). It should also be noted that some of our members may also comment directly to you in their own right.

In general, the PAMG supports the proposed initiatives in this paper but the Group's comments relate more specifically to Chapter 8 – Aviation Infrastructure, Chapter 9 – Aviation Emissions and Climate Change and Chapter 10 – Noise Impacts.

Chapter 8 – Aviation Infrastructure

The Group concurs with many of the findings of the Green Paper and, despite a focus on Sydney Airport, notes that these issues are extremely relevant and timely for Perth Airport, which is experiencing unprecedented growth.

Definitely there is support for greater transparency and certainty through the airport Master Planning process, however, there needs to be improved consultation at the outset, not just the occasional presentation to update Local Government Councils or media releases after the fact. At present, little more than lip service is paid to the need for consultation given that the land is under control of the Commonwealth.

The Group would like to see the Perth Metropolitan area Airport Operators actually involve its member Local Governments in the concept phase of developments so that each stakeholder can communicate with the Airport Operators regarding their needs and work towards a consensus on mutually beneficial planning concepts.



There has been little to no consultation with regard to land use planning for the airport and non-aeronautical land, yet all traffic generated by the additional uses passes through local authority road networks and impacts existing infrastructure, none of which is offset by developer contributions.

For one of our Local Authority members there is an entire Structure Plan area adjacent to airport land that our member cannot undertake further planning of because of the lack of certainty and assistance from the State government with major infrastructure planning. Furthermore, the non-aeronautical land uses have a competitive impact on existing land uses within the Local Authority boundaries.

It is noted that the Green Paper proposes two new areas of formalised input into the planning process. These are the Airport Planning Advisory Panels and the community consultation groups for each major airport. It is unclear what the Terms of Reference and proposed membership for these groups are. The Group is keen to ensure that these groups have credibility and are used effectively, rather than simply be there to provide the impression of consultation.

It is unclear as to what is intended by the introduction of ground transport plans (p 167). If this is intended to cover access roads and public transport to the airport then there is confusion between the powers of an airport and the responsibilities of State or Local Government. If it is only intended to cover transport links within an airport precinct there still needs to be a high level of integration with the State and Local Government road and public transport infrastructure.

The section on identifying uses which are non-compatible with airport sites raises some concerns. This seems entirely focussed on compatibility with aviation activities, and includes child care. It doesn't seem that this section addresses the extent to which some uses are compatible with the non-aviation based activities that takes place in airport precincts. A child care centre seems perfectly compatible with an office park on non-aviation based land.

Further to this, there is the section on safeguarding future aeronautical needs from inappropriate development in surrounding areas. The intent of this is supported. However, there will need to be very good and ongoing liaison, coupled with timely responses to requests for feedback from the local government authorities, if this is to work.

Chapter 9 - Aviation Emissions and Climate Change

During development of an effective policy framework to respond to climate change, other elements that could be considered are:-

- Involving the community e.g. local schools and environmental volunteers in significant tree and flora planting programmes at airports. This will not only assist with carbon emission offsets but also promote community partnerships with airports.
- Airport Operators, when planning new buildings and structures on airports should incorporate clean energy and environmentally sustainable design principles. This should also apply to their tenants constructing on airport land for non-aviation related development.

Chapter 10 – Noise Impacts

Although the flight path tracking software for public information and use is a good tool for communities to become informed on aircraft noise and flight path patterns, these do not address



the inadequacy of the current noise complaint reporting process. The public want responses to their complaints in a timely manner, not some 2 weeks after the event.

Airport Operators should also be made to improve customer relations by undertaking community advertising (radio, newspapers, website) if conditions are such that flight departure/arrival landing patterns need to be altered due to wind/weather conditions. Such changes although not entirely predictable could be communicated better to the community so that the affected public are aware that temporary changes have been made to flight paths due to weather/maintenance conditions and aircraft noise impacts may occur.

General Observation

It is disappointing to note that this Green Paper doesn't appear to offer any opportunity to raise the management of Airport Leases by the Department of Infrastructure, Transport, Regional Development and Local Government (formerly DOTARS) or rating issues generally.

There is a "competitive neutrality issue" that still exists as far as when Commercial Airport developments and vacant land are rated as it is treated differently to off airport commercial development or vacant land ownership. The Department does not appear to understand their lease management responsibilities fully nor how Local Government rating systems work which leads to poor advice to Airport Operators which leads to disputes over rates. The Commonwealth Auditor General endorsed this view when our Local Government member, the City of Belmont, was managing a major dispute over rates with Westralia Airports Corporation (operators of Perth Airport). The Department (DOTARS at the time) were openly criticised by the Auditor General for poor lease management.

The Group seeks assurance that provisions will be made to ensure the Department is made accountable for its lease management responsibilities and to act with consideration for all parties impacted by the Commonwealth's Airport leases.

Thank you for the opportunity to comment on this National Aviation Policy Green Paper. The PAMG considers public and stakeholder consultation critical to ensuring mutually acceptable outcomes for the local communities the Group represents, State and Commonwealth agencies and our Airport Operators in Perth. We look forward to continuing dialogue on this matter.

Should you have any enquiries or require additional information, please do not hesitate to contact the PAMG's Secretary, Lesley Howell on 9477 7293 or email lesley.howell@belmont.wa.gov.au.

Yours faithfully

A handwritten signature in black ink that reads "Glenys Godfrey". The signature is written in a cursive, flowing style.

Cr Glenys Godfrey
PAMG CHAIRPERSON &
MAYOR OF THE CITY OF BELMONT