

SHOPPING CENTRE

COUNCIL OF AUSTRALIA

27 February 2009

Department of Infrastructure, Transport,
Regional Development and Local Government
GPO Box 594
CANBERRA ACT 2601

By email: aviationstatement@infrastructure.gov.au

Dear Sir/Madam

Aviation Green Paper

The Shopping Centre Council of Australia (SCCA) would like to offer the following comments on Chapter 8 of the Green Paper – Aviation Infrastructure.

We welcome proposals in the Green Paper to improve the development assessment process for non-aviation development on airport land. These measures include:

- establishing expert Airport Planning Advisory Panels for each of the major airports to independently assess, at the Minister's request, airport Master Plans and Major Development Plans.
- requiring airports to publicly disclose more information as part of the five year review of their master plans, including significant details about their development proposals for the next three to five years;
- providing a power for the Minister to call for additional detail in areas which have been proposed for non-aeronautical development;
- reviewing the triggers for the major development plan process to ensure that those developments of most interest to the community are subjected to proper consultation processes; and
- providing a call-in power for the Minister to ensure consideration of sensitive development proposals, which would not otherwise have been subject to consultation.

While the stated intentions in the Green Paper are supported, there is however a lack of detail in many of the proposals. For example, one of the greatest inequities in the current airport planning system is the absence of any requirement on airports to contribute to the cost of infrastructure. At present an airport lessee can develop a large commercial or retail centre that generates a lot of extra traffic but - unlike any other development - tax payers and rate payers, not the developer, have to meet the cost of any necessary road and traffic upgrades. This is clearly not in the public interest. It is also a matter of great concern to members of the Shopping Centre Council because it delivers a windfall advantage to airport lessees over other developers who are required to pay developer contributions.

Leaders in Shopping Centre Advocacy

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The Green Paper notes this concern and states that the Government intends to examine "the impact of airport development on surrounding transport and community infrastructure and how the leased federal airports might contribute to this infrastructure". This is a long way from requiring airports to pay developer contributions in relation to their commercial, non-aviation, developments.

We are also disappointed that the Commonwealth Minister intends to retain final decision-making authority for land use planning and development on-airport. The SCCA remains of the view that the most equitable approach would be to abolish the exemptions the airports currently enjoy from state and local planning laws for non-aviation development (only) so that these developments have to comply with the same laws as everyone else. While Commonwealth control of aviation developments at airports may be warranted, given their national significance, there is no public interest justification for exempting non-aviation development from local planning laws – especially given that the Commonwealth requires its own businesses to comply with local planning laws and yet exempts private businesses from these laws simply because they *lease* Commonwealth land.

We emphasise that we are not saying there should be no commercial or retail development on airport land. We are simply saying that if there is to be commercial or retail development on land that has previously been set aside for aviation purposes, it should be subject to the same level of public scrutiny, community consultation, planning assessment, and developer contributions as similar developments under state or local planning laws.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Milton Cockburn', written in a cursive style.

Milton Cockburn
Executive Director