

27th June 2008

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

By email: aviationstatement@infrastructure.gov.au

Dear Sir

National Aviation Policy

The Australian Construction Industry Forum Limited (ACIF) is a not-for-profit organisation with thirteen members:

Air Conditioning and Mechanical Contractors' Association of Australia
Association of Consulting Architects Australia
Association of Consulting Engineers Australia
Australian Institute of Building
Australian Institute of Quantity Surveyors
Construction Industry Engineering Services Group
Facility Management Association of Australia
Fire Protection Association Australia
Master Builders Australia
Property Council of Australia
The Institution of Engineers Australia
Planning Institute of Australia
The Royal Australian Institute of Architects

ACIF member organisations represent most disciplines within the private sector of the built environment sector, including planners, end users and asset managers, investors, designers and constructors. Firms in the industry are primarily responsible for planning, design, construction and operation of the nation's built form.

ACIF and its members have a keen interest in the key role of the nation's airports in transport planning generally, and the planning and land use issues associated with them in particular.

This submission addresses the planning and land use issues, and key relationships between airports and their surrounding communities, and responds to the questions raised in the Airport Planning and Development section of the Department's Issues Paper.

Individual ACIF members will make separate submissions in response to the Issues Paper.

Airports and Communities

Planning for major capital city airports has historically been a matter for the Commonwealth Government, and until the 1980s was characterised by airports being treated as standalone, specialised, infrastructure assets. Even though the full commercial potential of major city airports began to be realised with the advent of the Federal Airports Corporation in the 1980s, planning and land use issues associated with the commercial exploitation of airports has been treated largely in isolation from the planning policies and instruments of State and Local Governments.

The *Airports Act* excludes provisions of State and Territory laws relating to airport land use planning. This has led to growing concern at:

- the development of commercial uses unrelated to the core functions of airports;
- the failure of planning under the *Airports Act* to account of local or regional planning strategies; and
- the lack of a level playing field in relation to the financial imposition on developers within and outside the airport fence.

Suggestions for local and state direct control over major airports are likely to be seen as contrary to at least the spirit of the *Airports Act*. However, airport development also generates significant needs for and impacts on wider metropolitan infrastructure provision.

ACIF suggests that airport development needs to be considered, and regulated, within a wider community framework. It supports the views of the Australian Mayoral Aviation Council (AMAC) arising from an international study tour in 2006 that, the evolution to airport cities

"reinforces the need for national and state governments to develop plans and strategies for the development of major airports so that they are able to grow and development in a manner which maximises their economic benefits and complements rather than competes with surrounding areas".

This report also notes that more direct engagement of state and local planning policies applicable to major airports overseas has not hindered the

"growth or development of either privately owned airports or the publicly owned ... airports".

Airport area planning

Metropolitan planning processes must integrate airports into their economic strategies. This cannot occur without certainty about the development intentions of airport owners.

The lack of a level playing field in relation to the financial imposition on developers within and outside the airport fence has been one of the major criticisms of the operations of the *Airports Act* as a separate planning approval system.

Sub-regional (i.e. 'airport region') plans for airports, prepared with tri-governmental and private input, funding and support, and encompassing the broad gamut of off-airport environmental, economic and social considerations (including network infrastructure provision, transportation, orientation of land uses to the airport, location of commercial and activity centres, building heights, urban design etc) should be considered.

These plans could be given legal force under state instruments. These sub-regional plans would also require airports to properly address the extent of their economic, social and environmental impacts arising from their aeronautical and non-aeronautical development on the efficiency of off-airport operations and development. It would be understood that these plans would be compatible with and integrated into broader metropolitan strategies. The need to ensure that airport development is fully integrated with metropolitan planning processes is a major plank of the Planning Institute's position statement on development of airport land (*Australian Planner*, 43, 3, 2006).

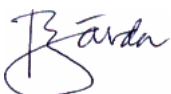
If need be, to ensure tri-governmental co-ordination and integration, the Commonwealth Government should enter into binding agreements with airport owners that requires non-airport development on airport land to comply with state planning policies and instruments.

Amendment of Airports Act and Regulation

If Commonwealth Ministerial control of airports is to continue, ACIF suggests that amendments to the *Airports Act* would align the operation of the legislation more closely with planning best practice:

- the content of an airport master plan or major development plans should address the relationship to and consistency with state and local environmental planning strategies and plans;
- master plans and development plans should include proper assessment of the impact of airport development, particularly non-aeronautical development, on the surrounding airport region to ensure due consideration is taken of off-airport environmental, social, and economic impacts;
- the Minister should provide reasons for approval of a master or development plan, not just in cases of refusal;
- the Minister should consider in approving a major development plan an assessment of land use impacts "in areas surrounding the airport", consistent with the requirements in relation to master plans;
- the objects of the Act should include a reference to sustainable development.

Yours sincerely



Peter Baroda
Executive Director