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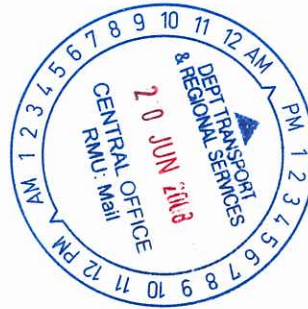
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*Mr Cole*  
Department of Infrastructure, Transport,  
Regional Development and Local Government  
GPO Box 594  
CANBERRA ACT 2601



*→ Scott Stone  
CL R. Paris*  
Dear Sir/Madam

### **“Towards a National Aviation Policy Statement”- Issues Paper**

Council writes in response to the “Towards a National Aviation Policy Statement” Issues Paper released for public consultation in April 2008. The City of Holdfast Bay thanks you for the opportunity to provide 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. Council has two primary issues that it would like to bring to your attention through this submission. The first issue relates to the further development of non-aviation related land uses within airport sites, and the current planning control mechanisms for this type of development. Secondly, Council is concerned about aircraft noise and the lack of requirements for new residential development to comply with a minimum noise attenuation standard.

Like many airports across Australia in recent years, the Adelaide Airport has experienced a significant amount of growth in the number and scale of non-aviation land uses operating within the airport site. While Council acknowledges that private investment in airport land is an important reality of future airport upgrades, it is imperative that non-aviation development on airport sites is undertaken within the context of the surrounding communities and in accordance with Metropolitan and State strategic planning.

The Issues Paper acknowledges that airports are not islands, and the growth of airports can impact upon surrounding communities. It is questionable, however, as to whether the current planning controls can successfully mitigate the issues arising from development, such as additional traffic and noise. Draft Major Development Plans (MDPs) generally lack detailed information and proposals are often presented as basic ‘concepts’ only. Key stakeholders are therefore not presented with adequate information to conduct a detailed analysis of a development proposal at the public consultation phase, and are often not fully aware of the impacts on local communities until approval has been granted. Furthermore, the additional traffic and noise impacts that result from increased development are often left to local authorities or the State Government to manage, creating an additional resource and financial burden.

In addition to increased noise and traffic, retail development at airports sites such as supermarkets and brand direct shopping outlets operate in direct competition with existing regional and district centre shopping precincts. This is particularly an issue when commercial and retail development occurs within an airport site that it is not envisaged by the State Planning Strategy or Centres and Retailing Policy as these strategies are developed to maintain and protect the economic viability of existing retail centres. While the Adelaide Airport site provides an appropriate location for ‘bulky goods’ commercial development such as the IKEA store which are unable to be suitably located elsewhere, retail development beyond the terminal tenancies have created a ‘quasi’ regional centre that has not been appropriately planned for at a State or Local Government level.



While matters relating to aviation are of national interest and should continue to be governed by a Federal body, further development of private non-aviation land uses within airport sites should be governed by the planning framework of the relevant State. This approach would see a consistent level of assessment applied across the State, and it is considered that non-aviation development on airport sites would be better integrated with surrounding communities.

Aircraft noise is a sensitive issue for communities surrounding the Adelaide Airport. While the complete mitigation of this issue is a significant challenge, measures can be taken to ensure that new residential development incorporates adequate noise attenuation measures. Council is aware that there is an Australian Standard for *Acoustics- Aircraft Noise Intrusion- Building Siting and Construction (ASA 2021-2000)* and is currently considering the inclusion of this Standard in our Development Plan to assist future development assessments. It is considered, however, that Council's ability to enforce the Standard in new development would be considerably strengthened if the application of the minimum standard was mandated by legislation.

While Council acknowledges that all levels of Government and the Airports need to play a role in aircraft noise management, owners and potential purchasers of affected properties also have a responsibility to ensure that new and existing residential buildings employ best practice noise attenuation measures to reduce the impact of aircraft noise. It is considered that limited information and financial costs are the two biggest inhibitors to communities being able to fulfil their responsibilities. Therefore, Government and Airport sponsored community information and funding programs should be established and/or continued to assist property owners in tackling aircraft noise issues.

In summary, the City of Holdfast Bay acknowledges that the aviation industry plays a vital role in the country's economic growth and development and the continued operation and upgrading of Adelaide Airport is critical to the continued strengthening of South Australia's economy. Council is therefore pleased that the Department of Infrastructure, Transport, Regional Development and Local Government has initiated this policy review and trusts that the following recommendations will be considered:

- Incorporation of the assessment of non-aviation related development within a State planning system to ensure that airport development is better integrated with surrounding communities;
- Improving the way in which airports consult with local authorities and communities by prescribing a minimum level of information that is to be provided for new development proposals, which is consistent with the requirements under State planning legislation;
- Through legislative amendments, making it mandatory for new residential development in areas affected by aircraft noise to meet an appropriate noise attenuation standard; and
- Establishing and continuing government and airport sponsored community education and funding programs to assist affected communities to implement 'best practice' noise attenuation measures in new and existing residential buildings to reduce the impacts of aircraft noise.

The City of Holdfast Bay looks forward to the release of a 'National Aviation Policy Green Paper' and welcomes the opportunity to provide further comments on aviation policy.

Yours sincerely



Rob Donaldson  
CHIEF EXECUTIVE OFFICER



Ken Rollond  
MAYOR