

Queensland Airports Limited's position on the National Aviation Policy Issues Paper

19 June 2008

Summary of key points:

- Need to maintain the Regional Airports Entitlement Package but this should be included in all market bilateral negotiations as well as supported by marketing the benefits by Federal Government agencies in tourism and transport. This to be supported more proactively by regional airports.
- Federal Government to actively seek to reduce costs of mandated government charges at regional airports. Without the ability to reduce costs, the above regional entitlements package becomes difficult to sell to prospective airlines. Most other countries experience the benefits and attractiveness of secondary airports having lower costs as an incentive to operate compared to congested capital city airports. Examples of key cost reduction which can be supported by the Federal Government are:
 - Air Services Australia charges are significantly higher at regional airports (in particular the cost of Terminal Navigation).
 - Cost of security due to lower volumes in general (ie. LAGS and CBS). A Tiered system should be developed instead of blanket measures for security so it is destination specific - this avoids compromises on security levels but ensuring a sustainable cost base for regional airports.
- All regional ports should remain curfew free or be given flexibility to assist in attracting new airlines or at the least have the ability for them to be reviewed.
- Infrastructure around airports to support dispersion (local, state and federal issue). This refers to road and rail access to be included in Federal and State planning.
- Government need to continue to ensure regional airports can maximise revenue from non-aeronautical sources to offset pressure on aeronautical charges. This is unique to regional ports as they are more likely to be leisure based and have pressure on attracting new air services due to the lower yield nature of the leisure passenger.
- The existing pricing policies need to be maintained as there is significant competition within Australian airports and regulation would discourage further private investment in airport assets and thus less investment in the ongoing improvement of infrastructure.
- The allocation of the current passenger movement charge should be reinvested into the port from which it has been derived to reduce costs and improve passenger facilitation.
- A national approach to environmental carbon emissions and impact is essential. This should be lead by Government in the form of a committee made up of industry, government and international leaders in this area. A national strategy must provide detailed and measurable outcomes and standards as well as a communications strategy.

The below specifically addresses each question as outlined in the Issues Paper:

1.1. International Services

	Question	Queensland Airports Limited Comments
Key Challenges	<p>Do Australia's international air services policies serve Australia's national interest and balance the need to have an Australian based industry with robust competition from international competitors?</p> <p>What should our negotiating priorities and approach be in the future?</p>	<p>Keep regional entitlements package and regional airports to become more proactive in marketing this benefit. Gold Coast Airport has been successful in utilising this package to establish services into Australia by newly formed carrier Air Asia X against competition from a number of airports servicing resort areas in the Asian region.</p> <p>In parallel to this, regional airports need assistance in reducing</p>

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		<p>government mandated costs to position themselves as an attractive proposition. Allocation of revenue collected from the Commonwealth's PMC for a specific airport should be sufficient to cover the extensive border agency facilities that must be provided by the airport free of charge and for adequate staffing to operate the processing positions necessary for timely passenger facilitation.</p> <p>Consideration in the simplification and cross country coordination for Tourist Visas is urgently required to keep up with the changing industry model. For example, long haul low cost carriers generally do not interline over international hubs and thus tourists can have to pay for two visas in two countries just to transit to Australia. This extra expense can work against attracting tourism to Australia over competitor destinations in Asia.</p> <p>The recent increase in the passenger movement charge is another disincentive to attract international tourists to Australia. We urge the government to reconsider this new tax if it is not used directly to reduce facilitation costs at the collecting airport.</p> <p>More serious approach to recognition of value of Tourism to compete with Asia markets (ie. Malaysia) who are investing heavily in attracting this key economic form of trade. ICAO provides direction in relation to International ports. Unfortunately this international standard is applied to regional ports. This needs to be reviewed so that regional ports are regulated using a risk based approach.</p>
	<p>How might the Australian Government continue to develop improved competition and access to services while maintaining appropriate levels of aviation safety and security?</p>	<ul style="list-style-type: none"> • Continue to work closely with National Tourism Policy to ensure no contradiction between the current tourism desire to develop regional tourism dispersion and the conflicting aviation cost imposts on regional airports. • Ensure that regulations are outcomes based and not overly prescriptive.
<p>Australia continues to expand it's international air service</p>	<p>How will new routes, technology and business structures change the profile of Australia's aviation market?</p> <p>Given Australia's evolving aviation sector, to which markets should the Australian Government seek improved</p>	<ul style="list-style-type: none"> • Emerging markets to be considered for improved access are: India, China, Korea and Malaysia. • Maintain current scrutiny levels. This will keep a lid on costs. Outcomes based regulation as opposed to Prescription. • New generation aircraft with improved performance

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relationships	access?	characteristics will permit intercontinental flights from a number of Australian regional airports where this has not previously been possible because of infrastructure limitations. Airports and the communities they serve, industry groups and government need to work together to develop innovative organizational, administrative and technological solutions to exploit the regional disbursement opportunity these new generation airports offer. In particular the full capacity of GPS based air navigation aids and procedures should be exploited.
	<p>How might the Australian Government best ensure all international airlines flying into Australia maintain the highest of safety standards?</p> <p>How might the Australian Government most effectively monitor and enforce safety standards of airlines that lease aircraft rather than operating their own aircraft?</p>	<ul style="list-style-type: none"> • Imperative to keep our high safety record • Ensure CASA airline inspectors are empowered to review maintenance and aircraft records for all aircraft entering into Australian airspace.
Growing the regions and cargo	<p>How might access to Australian destinations outside the four major gateways of Sydney, Brisbane, Melbourne or Perth be increased?</p> <p>What role could State governments and communities have in attracting foreign and Australian airlines to Australia's smaller international airports?</p>	<ul style="list-style-type: none"> • The above mentioned example of Air Asia X is the result of a unified and concerted effort by Gold Coast Airport/Gold Coast City Council, the Queensland Government and service providers on the airport to develop a competitive package tailored to suit this new model of long haul low cost carrier. This effort resulted in south east Queensland and northern NSW attracting air capacity (that had no intention of using complex and expensive capital city airports) away from competing international destinations in the Asia-Pacific region. A key ingredient of this package was the ability to offer to Federal Governments Regional Entitlements package.
	<p>Should Australia continue to pursue an "open-cargo" policy for dedicated cargo services?</p> <p>What cost-effective strategies could be employed to avoid delays in the transport of time-sensitive air freight?</p>	<ul style="list-style-type: none"> • It is doubtful whether Australia's traditionally low flight rates for outbound air cargo would be sufficient to attract more dedicate freight capacity even if an "open cargo" policy was adopted.
Access to Australian markets	<p>Are the current restrictions on foreign airlines accessing the domestic market appropriate?</p> <p>Should we be encouraging more international airlines to operate from Australia to third markets?</p>	<ul style="list-style-type: none"> • Yes. Whilst Australia only has limited open skies this is an appropriate policy at the current state of development of international route liberalization. As a relatively "thin" international route, Australian bound services need some degree of certainty to invest in route development. • No as this is based on demand and our geographical position doesn't support this.
Facilitation	How might existing Australian airport infrastructure best	<ul style="list-style-type: none"> • Government needs to continue to enable airports to make

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and border control	adapt to the challenge of processing large influxes of passengers?	<p>non-aero revenue (eg. carparks) and continue current airport pricing policy as LCC's increase pressure on airports to diversify revenue.</p> <ul style="list-style-type: none"> Government invest in technology to ensure that passengers can be processed through security screening more efficiently.
	<p>What are the implications of expanded international operations at secondary airports, including for border security?</p> <p>Should Australia seek to limit international airline and charter operations to a defined set of international airports to ensure affordable border security?</p>	<ul style="list-style-type: none"> The new generation of medium sized wide bodied aircraft offer significant potential to disperse international traffic through regional airports. There needs to be more integration of the many service providers at regional airports to better utilize increasingly scarce human resources. This demands a more highly skilled and flexible workforce together with allocation of financial resources to facilitation. As mentioned above, the logical source of funding would be from allocation of the PMC collected at a specific airport. Australia already has a number of underutilised regional airports which could benefit from a more holistic approach to destination marketing, affordable airport services and passenger facilitation. There would be limited demand for greater numbers of international gateways than those that already exist. Areas which may sustain a new international gateway are central/north Queensland and the NSW north coast. The focus though should be on dispersion through existing regional gateways in the first instance. Australia's active border intervention policy in comparison to, for instance, intra-Europe, makes facilitation more complex and more expensive than for other regions. This policy necessitates expensive border control processes and relatively large establishments that are difficult to sustain at low volume international airports.

1.2 Domestic Services

Key Challenges	Does the deregulated domestic airline market remain the best model for delivery of Australia's interstate air services?	<ul style="list-style-type: none"> The current policy settings have served Australia well. High capacity jet services now service more regional destinations than would ever have eventuated under the earlier high costs highly regulated model. Australian airlines have learned to adapt favourably to a more competitive environment. Australia now appears to have the optimum balance between
	Are there any constraints on the ability of Australian-owned airlines to remain competitive with foreign-owned	

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	airlines in the Australian market?	safety, service levels and costs. Flying is no longer the preserve of the well-off. Lower income families can now experience the convenience of air travel where previously they relied on less safe and more time consuming surface transport.
	Do the existing criteria strike the right balance between allowing Australian airlines to access global investment markets and promoting an Australian-based aviation industry?	<ul style="list-style-type: none"> The liberal domestic aviation policy has resulted in significant investment in people, equipment and infrastructure for the benefit of many urban and regional Australian families.

1.3 Regional and general aviation

Key challenges - regional air services	What should be the basis of government and industry policy towards air services to regional and remote communities?	<ul style="list-style-type: none"> The regional aviation market in Australia has been polarized into segments. One centres around the booming resource rich regions characterised by high incomes, increased business traffic and a growing fly-in fly-out tendency. The second centres around those traditional regional areas which depend on rural industries for their well being. The continuing drive for efficiency in these regions has resulted in a depopulation effect in many areas. Whilst aviation costs are as high as they are for areas in the former segment the ability to pay for such services is far more limited. In many regions there is a need for a much more integrated land/air transport network. This would be characterised by improved roads, better medium range public transport and fewer airports. Some state funding of intrastate air services may be better utilized subsidizing land transport to a smaller number of regional airports. Closer analysis of the best use of funds is needed based on return on investment for the regions.
	Are security and safety measures adopted for major capital city trunk routes appropriate for regional and remote services? If not, what alternative measures could be adopted?	<ul style="list-style-type: none"> The demands for universal aviation security measures from some quarters has led to a rapid expansion of screening activities at regional airports. This has resulted in significant costs imposts at those airports and a number of discrepancies have arisen. A good example of this is the requirement to screen jet RPT operations at Mount Isa and all other services that coincide with jet operations whilst at near by Cloncurry mining charters using jet aircraft can operate into a major capital city airport such as Brisbane with no screening.

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		<ul style="list-style-type: none"> • The cost imposts on regional airports has been amplified in some cases where the airlines have refused to pay for the screening services provided as mandated by the office of Transport Security. Regional airports have little leverage over a major airline in recouping these costs where that airline holds a near monopoly on services to that community. • There is reason to undertake a more specific review of the impact of provision of aviation security at smaller regional airports. These concerns are made more complex because of the shortage of available part-time staff in mining boom areas. Mount Isa Airport for example, has developed a multi skilled workforce eg; cleaners/screeners.
<p>Key challenges - general aviation</p>	<p>How has micro-economic reform impacted on general aviation businesses and what strategies need to be put in place to ensure that access to airport infrastructure does not impede industry viability and growth?</p>	<ul style="list-style-type: none"> • Support GA dedicated airports. The rapid urbanisation around the major population centres in Australia has seen the demise of many privately owned airfields. This has resulted in an increasing concentration of GA activity at the remaining regional airports. Many of these airports are experiencing significantly increased domestic and international jet services. At Gold Coast Airport for example, international wide - bodied aircraft remain at holding points for significant periods whilst a pilot training operation complete a circuit. At times when operating costs are accelerating for airlines a solution needs to be found to allow such operations to co-exist more efficiently. • More importantly state and local government regional planning schemes need to make provision to protect existing GA facilities or reserve sites for new GA infrastructure. • A review of GA infrastructure and support main training ports in Australia is needed including a National Centre of excellence that deals with industry training. A centre should be established in a regional centre which des not have large numbers of jet aircraft movements. • Large airports understand the need for GA and its role in the industry. However its access to larger ports should be regulated by airports to allow for the optimum use of the infrastructure. • Overall, QAL is against a one size fits all approach.
	<p>Do the needs of general aviation operators warrant any changes to airport regulatory and planning arrangements?</p>	<ul style="list-style-type: none"> • Capacity constraints will impact on the number of people that can be processed through an airport. We need to ensure that

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		the facility is available to the largest number of people possible. The airport planning strategy should be based on this principle.
	How can general aviation operators, particularly small businesses, establish viable business models that allow them to take advantage of current buoyant conditions in the aviation market? In particular, how do these businesses meet the increased cost of skilled labour and improve recruitment and retention of their skilled workforce?	<ul style="list-style-type: none"> Assessments undertaken at the three regional airports operated by QAL indicate that the GA sector is heavily subsidised by the charges levied on airlines and airport tenants. In most cases GA charges have remained very stable but they are at such a level they do not provide a return on investment hence it is often difficult to justify additional investment in GA infrastructure.
	<p>What role should all levels of government have in protecting secondary airport infrastructure and in providing for new infrastructure?</p> <p>How can the general aviation industry provide the necessary investment to renew the ageing aircraft fleet? Is there a role for governments?</p> <p>Are additional measures required to ensure the continued safe operation of ageing aircraft?</p>	<ul style="list-style-type: none"> Government can assist airports with the need to work with and educate councils on aviation needs and requirements. Improved interface with other agencies to establish consultation lines (ie. MOU). Again, a centre of excellent and development of GA clusters supported by government. GA clusters would be those seen to have a long term positive impact on regional communities and national aviation sustainability.

1.4 Addressing skills needs in the aviation industry

Key challenges	What strategies should the industry adopt to attract, retain and plan for their future skills needs to remain competitive in a tight labour market, and how can these be improved?	<ul style="list-style-type: none"> Overall, a training resource program to look after all levels of aviation is needed. National accreditation or incentive scheme to train in private sector with support from government in key areas. Universities and TAFE institutions should be involved with private sector in developing tailored courses to align with long term aviation needs.
	<p>What are the long-term training needs for the Australian aviation industry?</p> <p>Where will the future pressures lie? How do we ensure the industry remains internationally competitive in retaining key staff and in attracting new entrants to the workforce?</p>	<p>Areas of Training that need particular attention:</p> <ul style="list-style-type: none"> Maintenance Pavements Operations Security <p>Recognition of qualifications across all industries with all countries is needed for better labour force utilisation.</p> <p>Encourage diversity in the selections of employees and reward employers through a traineeship scheme.</p>

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		<p>At a number of its regional airports QAL has integrated the functions traditionally performed by a number of different organisations. This has allowed more full time staff to be employed and more structured training programs to be developed. It has been found, however, that most institutional aviation programs centre around flying and aircraft with little attention to airport specific courses.</p>
	<p>How should the Australian Government and industry work together to ensure the needs of the aviation industry are taken into account in its broader skills framework?</p>	<p>Establish a centre of excellence that encompasses the main skills to supply the industry. The centre will grow to assist the region also to develop industry skills.</p>

2.1 Airport planning development

<p>Land use planning and development approvals at major airports</p>	<p>Are the planning and development mechanisms under the Airports Act working effectively?</p>	<ul style="list-style-type: none"> • The current arrangements under the Airports Act generally have fulfilled government and community expectations. The most vocal opponents to the current arrangements appear to arise from commercial interests which compete with some airport non-aviation developments. • The current planning regime for leased federal airports is more regions in its application than many adjacent locally controlled areas. The allocation to dedicated Airport Building Controllers and Airport Environment Officers ensure regions compliance with the various levels of planning required under the Act. • QAL leases and operates three regional airports in Queensland. Each one experiences very different circumstances in relation to integration of planning with the various local government schemes. Gold Coast Airport is a good example of the complexity to integrating planning with local authorities. One half of the airport is in Queensland within Gold Coast City and the remainder in New South Wales within the Tweed Shire. Gold Coast Airport places equal importance in working with both Councils but has very different experiences between local authorities. The airport works closely with Gold Coast City in drafting provisions for the Gold Coast planning scheme whilst it is much more
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		<p>difficult obtaining similar cooperation from Tweed Shire. The Queensland Government has developed regulations which protect the runway end safety zone at the northern end of the main runway but there is no such protection for the southern end in NSW.</p>
	<p>How can we improve consultation with State and local authorities and with the community?</p>	<ul style="list-style-type: none"> • Airports in general meet, at least, the requirements of consultation under the Airports Act. In most cases they far exceed these requirements. Airports are very important parts of community infrastructure and community support is essential to safeguard future development options.
	<p>Could the regulatory regime better facilitate genuine long-term co-operation between airport operator companies and state and local governments on land use planning?</p>	<ul style="list-style-type: none"> • There is currently adequate opportunity for airports and local and state planning authorities. Generally airports are proactive with local government and community consultation but the wide variety in forms of and political imperatives of local authorities across Australia make it difficult to establish prescriptive arrangements to suit all circumstances. • The Airport Act requirements are often more onerous than local planning schemes. A brief comparison of both in the Queensland context is included in Attachment 1.
	<p>How can we better integrate investment on airports with the funding and construction of improved road and rail links to and from our airports?</p>	<ul style="list-style-type: none"> • QAL places considerable emphasis on participating in state and local government infrastructure and planning strategy initiatives to ensure that the airport is part of an integrated transport plan for the regions they service. It is a commercial imperative for airports to have the best possible access to the surrounding population areas.
<p>Non-aeronautical development on airport sites</p>	<p>How can the regulatory regime better ensure non-aeronautical developments do not compromise the aeronautical requirements of airlines and airports?</p>	<ul style="list-style-type: none"> • The current planning processes, particularly the Master Plan requirement clearly articulates future aviation traffic growth projections and the aviation infrastructure required to meet those needs. Aviation activities on an airport and its future expansion are more likely to be compromised by uncontrolled developments outside the airport. This is where the airport and the Commonwealth need to be proactive with state and local authorities to ensure these important components of community transport infrastructure can accommodate current and future aviation needs.

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	How should the potential commercial impact for off-airport competition be taken into account in planning on-airport non-aeronautical development?	<ul style="list-style-type: none"> This is best addressed in the Master Plan. In the case of QAL airports the general land use principals has been spelt out for the last 10 years and have been through two rounds of public consultation. The MDP process provides a further layer of consultation and assessment. The current regime is comprehensive and inclusive. Even outside the airport regime commercial entities try to limit competition.
"Safeguarding" Australia's key airport infrastructure	How should guidance be formulated for airport operators and others about public safety zones for locations at significant risk of on-the-ground fatalities from aircraft operations?	<ul style="list-style-type: none"> As mentioned above, Queensland Government has initiatives to declare runway end safety zones, NSW does not. The Queensland provisions, however, are not totally consistent with ICAO and Australian practice. There is a need for an Australia-wide planning initiative to establish runway end protection zones are consistent with international standards.
	How can the mechanisms for guiding development around airports be improved to ensure potential issues from aircraft noise are fully addressed in planning?	<ul style="list-style-type: none"> This can be achieved by Airservices Australia leading community forums that deal with aircraft noise. They are the only ones who are able to make changes that affect noise distribution and more can be done here.
	How can we better ensure off-airport developments subject to state and local government planning regimes, such as tall buildings, do not compromise the safe and effective use of aviation infrastructure?	<ul style="list-style-type: none"> Integration with state and local planning policy is essential. QLD well in front of other states in this area. Airports have a role to play in continuing the education of councils on protection of airspace regulation. Government could assist by developing a training program for councils to highlight key issues and challenges for airports to improve overall industry understanding. The example above gives an outline of initiatives taken by Gold Coast Airport with Gold Coast City and Tweed Shire and the relative success with each in adopting planning initiatives to protect airspace. Again this is an area where Commonwealth, states and local authorities need to agree on a uniform set of national standards and practices to protect current and future airport sites.
Future airport needs	How can future airport needs best be addressed, recognising the importance of airports as an element of the national economic infrastructure?	<ul style="list-style-type: none"> This is an airport issue, not a government issue. Follow the core aviation business or services that benefit passengers .
	What are the current and future pressure points in relation to airport capacity?	<p>Key points include:</p> <ul style="list-style-type: none"> Smarter scheduling through industry partnerships Curfews removed or minimised to allow for a better spread of operations and utilisation of airport assets. General aviation and smaller aircraft training causes

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	<p>Can the growing use by civil aviation of joint user or Defence owned airports be safely and effectively accommodated?</p>	<p>congestion with larger jet aircraft.</p> <ul style="list-style-type: none"> • Yes, in most cases. In some cases specific defence needs may necessitate limits on civil operations. • In the cases where Defence contributes the much smaller percentage of airport development and maintenance funds the works program should be managed by the airport operator. Defence processes lead to more costly works programs. • Ensuring that Defence agrees to provide services in accordance with CASRs. Defence could sign MOU to be audited against CASRs so that deficiencies are known and are addressed.
	<p>How can the protection of the communities around airports from undue aircraft noise best be addressed as demand for services continues to grow?</p>	<ul style="list-style-type: none"> • All QAL airports have reduced noise complaints through development of regular communication processes with local communities principally through consultative committees. • Aircraft noise needs to remain with ASA, but better partnerships with airports and local councils and communities are required. ASA can be much more proactive by consulting with local councils on land use planning in particular. • Airservices to take the lead and ensure that the minimum number of people are affected by noise. • Commitment to the introduction of Required Navigational Performance(RNP). This will reduce the impact of noise on communities.
<p>Pricing of airport services</p>	<p>As the aviation industry grows and changes with the advent of low cost carriers and other innovative service providers, should changes be made to the regulatory framework for the pricing of airport services and monitoring of service quality?</p>	<ul style="list-style-type: none"> • The "light handed" regulatory regime formulated after the collapse of Ansett has resulted in a surge of airport investment that has, in general, matched the growth in low cost carriers. That growth in turn occurred as a consequence of the Australian government's removal of shareholder restrictions on domestic airlines. The current regulatory regime has made air travel affordable for a much larger proportion of the Australian community than could ever have been contemplated under the earlier regulation focussed policy settings. • Independent assessments by national bodies such as the Institute of Engineers Australia have found that airports, as an infrastructure asset class, are better equipped than any other class of infrastructure to handle current and projected usage.

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		<p>Private sector ownership and less restrictive pricing arrangements have removed many of the barriers to earlier under-investment.</p> <ul style="list-style-type: none"> • A good case study is Gold Coast Airport which has been privatised for 10 years. In the first four years after privatisation it was impossible to reach agreement with incumbent full service carriers Qantas and Ansett on badly needed facility upgrades at Gold Coast. The only major investment during that period was \$2.0 million for the construction of a small international terminal for Australia's first low cost carrier, Freedom Air. During that period passenger traffic through Gold Coast Airport dropped from 2.0m passengers per annum to 1.7 million. In the six years since the removal of price regulation Gold Coast Airport has reached agreements with airlines for investment in facilities in excess of \$180 million and passenger movements have grown from 1.7 million to 4.3 million. • In an open economy, regulation only needs to be contemplated where there is market failure. The performance of Australian Airports and the Australian aviation industry as a whole has experienced unprecedented growth. Again taking the example of Gold Coast Airport, it is possible to illustrate that there is competition amongst airports. Gold Coast is exposed to competition from Brisbane Airport and its significantly greater economies of scale and from the even closer Ballina Airport that hosts regular jet services but without the impost of Air Services Australia air traffic and rescue and fire fighting charges. This resulted in Gold Coast Airport's developing a strategy centred around the leisure market and LCC's. This has allowed the airport to develop facilities which are custom designed to accommodate this sector of the market whilst maintaining convenience and comfort for passengers. The airport is now pioneering the provision of facilities for long haul LCCs that wish to avoid the costs and complexities of the much larger capital city facilities.
	<p>Is there sufficient transparency in the setting of charges for services at those airports that are not subject to price or quality of service monitoring?</p>	<ul style="list-style-type: none"> • There is generally a high degree of "transparency" in airport charges. All airports publish a schedule of aeronautical, terminal, security and carparking charges. In addition airports often offer new route incentives and marketing

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		<p>assistance in cooperation with state and local tourism promotion organisations and tourism operators. In the case of regional airports, whose growth has been driven by LCCs, the discipline in managing costs exhibited by the LCCs is passed on to the airports. In a more regulated environment the growth experienced in air travel in Australia over the last 6-7 years would not have been possible.</p> <ul style="list-style-type: none"> • All QAL airports publish a full list of charges for aeronautical, security and carpark related services. The only exception is the charges for security screening in Townsville where the screening authority, a particular airline, refuses to disclose the charges it levies on other airlines for the service. • The Australian aviation industry is amongst the most competitive in the world. This has had resulted in the opening up of air travel to a whole new class of consumer. A return to a more regulatory environment must be to be the detriment of these consumers and we are strongly against any change to the current regime.
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2.2 Air traffic management

<p>Key challenges</p>	<p>How can Australia's air traffic management system best take advantage of new and emerging satellite navigation technologies?</p> <p>What is the role of government in the take up of the new technologies?</p> <p>Are there any regulatory impediments to Maximizing the use of new and emerging surveillance and navigation technology?</p>	<ul style="list-style-type: none"> • Air Services Australia is one of the worlds leading air navigation service providers. The TAATS initiative placed it in the forefront of ANS organisations in the adoption of GPS technologies. AsA should be encouraged to maintain its leadership in innovation in the application of these new technologies. Capacity and costs pressures currently experienced by airlines and airports demand this momentum be maintained more than ever. Initiatives such as full development of GPS functionality are more important than ever. From a regional airport perspective the widespread introduction of RNP approaches is urgently needed. • With this focus on AsA's core ANS responsibilities it does raise the question of the appropriateness of their responsibility for providing the airport operation function of Airport Rescue and Fire Fighting. Australia is the only country in the world where the ANS provider is burdened with this responsibility. The removal of this core airport function from airports leads to inefficiencies and duplication of resources, especially at
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		regional airports. The only discernable benefit is that it does allow ARFFS services at regional airports to be cross-subsided by the charges at major capital city airports.
	How do we enhance both air traffic management safety and capacity and efficiency?	<ul style="list-style-type: none"> As the demand for larger aircraft grows then the mix of GA and RPT aircraft need to be programmed more closely
	Are we effectively aligning airspace classifications and the level of services and facilities provided to reduce risk to passenger transport operations? Can we better identify risk factors?	<ul style="list-style-type: none"> Continue support ASA
	How do we ensure the development of Australia's air traffic control systems is compatible with global and regional systems?	<ul style="list-style-type: none"> Continue support ASA
	How can Australia's air traffic management development be aligned with broader policy considerations such as national security and the environment?	ASA needs to absolutely become more accountable for the impact on air navigation on the environment. A focused strategy to reduce fuel burn which can be phased in over the next few years is a priority to reduce the cost to industry and have a positive impact on the environment. This is a very achievable task which is vital.
	What steps need to be taken to ensure the retention, training and future supply of skilled air traffic controllers and associated professionals?	Continue with the proposed training program by ASA.
	What should a national air traffic management plan cover and who should be responsible for its development and implementation?	<p>ASA needs to take more immediate action to reduce costs to airlines in regional areas and across the network. This is a key priority for environmental and fuel saving and critical to the industry.</p> <p>Airport also need to be included in the consultation phase for increasing charges for airport ASA charges. There is currently no acknowledgement of the competitive position airports are in. Particularly as the 'total cost' of operating to regional ports is taken into consideration, we can no longer separate the cost of ASA charges at regional airports from the ability for an airport to attract new air services.</p> <ul style="list-style-type: none"> A national air traffic management plan should be a responsibility of ASA and cover: Services contestability for ARFFS ASA need to have risk share at airports, not just airlines. Needs to be based on passenger numbers and productivity Investigate a risk based approach to pricing

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		<ul style="list-style-type: none"> • More transparency on pricing from ASA • Look at more flexible options for maximising labour at regional airports.
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3.1 Safety regulation and regulatory reform

Key challenges	Are there ways in which the approach to Safety Management Systems could be enhanced?	Development of a Safety Management System (SMS) culture within the aviation industry is important, and this could be achieved by education and awareness for staff of the SMS that is in place, through proper inductions, awareness of the requirement and why, and a good continuous system of assessment of the staffing knowledge of the SMS.
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4.1 Aviation emissions and climate change

Key challenges	Should the governance arrangements for CASA be strengthened to better support the role of the safety regulator?	Not necessarily, but appropriate training and excellent knowledge base of the regulator is important. Their complete understanding of the CASA compliance role is important, and a good communication/liaison base or systems with industry is very important.
	How can CASA strengthen the way it relates to industry while meeting the community expectations of a firm regulator?	By ensuring that the regulations are focused on outcomes rather than over prescription. A good communication system with industry is important; CASA needs to understand that the industry has a commercial requirement, while still practicing a safety culture is important. CASA does not need to dictate but educate and liaise closely with industry, aiming to work with not against industry in ensuring a positive safety outcome for industry and the community.
	How can the Australian Government and industry ensure CASA completes its longrunning regulatory reform process as soon as possible, to give clarity to industry and to clear the way for new approaches to meeting the regulatory challenge?	Partnership arrangements, consultation, discussion and agreement with industry on any reforms. Engaging industry participants to lead the discussion and PIR process.
	What changes could be made to improve how Australia's aviation safety agencies work together?	Consolidate the agencies into one. That way eliminating duplication. Ensure that all staff are appropriately trained and continuously

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		trained, with good succession planning that allows the industry time to develop staff to high levels of understanding and culture in safety standards. At the moment, the industry is short on well informed and trained staff in the safety standards area.
	What steps can the aviation industry as a whole take to ensure it maintains safety standards as it grows and diversifies?	By ensuring that regulation goes through rigorous industry and peer review with the focus on outcomes
	What steps should be taken to ensure Australia maintains a high standard of aviation safety in the context of global developments?	By ensuring consistency with all SMS across all parts of regulations. Commitment and participation in the development of Safety Standards at an international level. Ensuring membership and participation with ICAO, and all other international standards developing bodies.
	What issues should a 21 st century aviation regulator be focussed on?	Outcome based regulations with more emphasis on industry outcomes that are not overly prescriptive. Education training on Safety Systems, audit processes, communication with industry on all aspects of Safety Management Systems and good consultation with industry on these issues.
	Is self-administration a key factor in the growth of recreational aviation? Is there more scope for some parts of the industry to self-administer? What are the opportunities and risks for the industry, regulators and the community in greater 'self-administration'?	Self administration requires a robust safety management process. Once consistency is achieved with SMS across the industry then risk controls are better understood. Self-administration is sustainable and achievable, although good guidance, direction and audit process from the regulator is necessary to ensure that recreational aviation is still practiced at the appropriate locations, in the appropriate manner, and considering the safety of the participants as well as the community and surrounding aviation industry. It is important that the recreation section of aviation is separate from the RPT section to ensure maximum safety separation standards.

4.1 Aviation emissions and climate change

Key challenges	What practical steps can the aviation industry take right now to reduce greenhouse gas emissions? Are carbon offset schemes enough?	Accept that airports are already taking steps to offset carbon emissions in the way that we construct our infrastructure. The Government needs to partner with private industry to provide guidance and ensure a national consistent approach and communication strategy. Government should engage industry to set up a committee made
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		<p>up of key stakeholders to develop a national strategy and measuring system for carbon emissions. A national approach ensures consistency and should include a communication strategy to raise awareness of what the industry is doing to proactively improve environmental outcomes.</p> <p>A tax on the industry (similar to the European examples) is not the solution for Australia.</p>
	<p>What measures should the aviation industry be taking in the short-medium term to reduce emissions, such as clean engine technology and clean aviation fuels?</p>	<p>Government needs to invest with industry support in alternative fuels and carbon offset programs.</p> <p>By establishing national metrics and key targets, airports and airlines can work to clear deliverable outcomes in a coordinated approach. This is absolutely essential.</p>

4.2 Aircraft noise

Key challenges	<p>Could the ANEF system be improved or be supplemented by other planning tools to better explain the impact of aircraft noise? Should State and local governments play a greater role in aircraft noise management? What should be the responsibilities of airports?</p>	<p>Reed that Airservices Australia needs to be proactive at the strategic level with the management of aircraft noise.</p> <p>Local Governments need to better understand the impact of building in the vicinity of an airport</p>
	<p>Should emphasis be given to airport/community partnership approaches, for example, based on locally negotiated agreements rather than generic legislative approaches?</p>	<p>Airservices should be accountable to the airport owners on the distribution of aircraft noise. Airports are best placed to understand the communities needs in regard to the distribution of noise.</p>
	<p>Can techniques for sharing information on aircraft noise impact be further developed to improve the supply of information to potential property purchasers and other affected parties?</p>	<p>Agreed. The information needs to be clear about flight paths not just the ANEF.</p>
	<p>Which airports in Australia need to remain curfew free and under what conditions? Can operations at airports be better managed to ensure the community is protected while at the same time providing for night time access?</p>	<p>Curfews need to be responsive to issues such as daylight savings. Greater dispensations should be considered during this period.</p>
	<p>How effective are the current noise enquiry and noise complaint services? Are there more effective ways to deal with people's complaints and requests for information?</p>	<p>They can provide more future trends and be more responsive. At the moment they simply provide avenue for complaint without any real actions.</p>

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	Can the services be better provided?	
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4.3 Consumer protection

Key challenges	Are existing consumer protections and airline procedures adequate in dealing with these challenges? Is it possible to improve passengers' travel experiences without adding unnecessary costs to airlines that would inevitably need to be passed on to all passengers?	<p>Improved communication on the various standards Australia deploys is needed to increase consumer experiences, especially for international visitors arriving in Australia.</p> <p>While CIQ and Customs procedures are key to protecting Australia, better signage on arrival to explain what the various stages of the queuing and processing is for is needed. Furthermore, videos for entry into Australia as shown onboard can be improved to help visitors prepare for the landing experience ahead of them.</p>
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4.4 Disability Standards

Key challenges	Are the current Transport Standards adequate to ensure the removal of discrimination from air travel?	Standards at airports are strictly supported and complied with
	Are current complaint and compliance mechanisms effective?	Yes

5.1 Aviation Security

Key challenges	Could Australia improve its approach to protecting air travellers from threats while facilitating quick and efficient travel? How can we improve the system to improve both security outcomes and passenger facilitation through airports?	<p>The current facilitation of passengers appears to be working well. We would encourage new technology to assist with improving the process.</p> <p>LAGS remains the slowest process and complex with transiting passengers. We look forward to technological improvements in the assessment of LAGs.</p> <p>Substantial technology reviews, assistance to industry in security facilitation as the security regime is very costly.</p> <p>Look at subsidies for the industry to enhance the security regime with high level technology, security in aviation is a national problem, and needs to be resolved at a national level.</p>
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		A consistent approach to security nationally, while understanding the risk profile of individual ports (ie. Sydney vs Mount Isa). Risk profile certain frequent flyer passengers, look at fast track security lanes for low risk passengers are possible options.
International developments	Is enough information available for passengers to make well informed choices before they travel in order to comply with security requirements?	Definitely not, the public requires an education process for them to understand the different requirements of flying domestically and internationally. A good education program run at a government level would speed up the security process, and also assist in the security outcomes. Government run education programs (brochures, TV, film etc) and continuously developing these programs would be of great value to the industry and the community as a whole. Working with airlines to include information at the time of booking (particularly online) would avoid expensive and environmentally unfriendly information distribution.
	Can more be done at our international airports to assist passengers to comply with security requirements?	Yes, in particular with the processing of passengers through LAGS Government agencies, airport operators and other industry participants could be more involved in the assistance and education of the travelling passenger. As discussed above, government education prior to passengers arriving at an airport is still the best means for a good fluid transition at an airport for the travelling community.
	Should more be done at airports where passengers leave for Australia to make clear our own security requirements?	Yes particularly in the case of LAGs. Education, this could be achieved at the airport of destination by both government processing agencies and airline operators at the check in process.
	What can be done by government and industry to achieve greater international harmonisation of aviation security measures?	The classification of sites needs to be risk based. The subsequent passing on of the costs for security needs to be considered also and again how to manage the situation. Furthermore, the government needs to ensure that Australia is well represented at international forums that develop security measures and process.
Threat	Should aviation security remain the key focus for government and industry?	Current security levels are meeting our expectations. A review is not required at this point (for GCA). Aviation security obviously needs to be considered, the security risk against Australia at a global level should be monitored. Risk analysis of industry should be considered while developing security measures for the industry.

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	Should more attention be paid elsewhere?	Aviation has now developed quite a heavy security blanket, and terrorism has proven lately to be looking at other mass gathering locations, such as trains and stations. Even sporting events have been considered, aviations good security processes have pushed terrorist activities to other areas, even though aviation is still on their agenda. Consistently taxing the airline industry only is not sustainable in a climate of rising costs.
	Is enough being done to enhance security in the aviation sector?	Yes. People and money is being thrown at security, however it is our belief that governments are not investing enough money and time on technology. Technology is the deterrent of the future, and could be developed to be a much more viable financial option.
	Are we thinking broadly enough about the likely threats we may face and how they may be countered?	Yes. The Department of Infrastructure is responsive to the industries needs. Governments are well developed in counter terrorism monitoring at a high level, intelligence information has proven to be very affective to date.
Efficiency and Costs	Could government spending on security be spent more efficiently? Could more focussed security measures provide a higher level of security?	Yes. Government spending on new technology, support by government to the industry on timing of implementation and a more risk based approach for regional airports would assist in a greater security outcome.
	Could the requirements imposed on industry be changed to achieve similar security results at less cost, or greater security at the same cost?	The need for detailed documentation is costly. The documents TSPs are overly prescriptive in the requirements for Industry Participants. Security measures are being imposed at great cost to the industry and the flying community, how these measures are being provided needs a national discussion and review. Support and assistance from government should be provided, as security has a national benefit to all Australians.
	Is the current charging regime for provision of security screening services equitable between major metropolitan airports and regional airports? Should alternative arrangements be put in place?	Regional airports are now being asked to provide security measures equivalent to Sydney/ Melbourne airports without the passenger throughput to cover the costs. Airlines will stop flying into regional airports in the future due to the costs associated with security requirements being placed on them by government. If government believes that the risk is at the same level for small regional airports as at high risk airports, then government should place a national security levy to spread the costs throughout the industry before regional aviation system fails.
Growth and	Whether current passenger security screening	Aircraft should be classified on their destination and origin. If they

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industry development	requirements based around jet aircraft should be extended to non-jet aircraft of similar capacity, speed and weight?	are assessed as a risk then security procedures should reflect that risk. You have to look at whether this will destroy the regional aviation system, against the passenger confusion of why a passenger on a jet aircraft is more important than a passenger flying on a non-jet aircraft. This leads to passenger confusion on the security outcomes.
	Is the security infrastructure at airports adequate?	CTFR airports security levels is appropriate. However, regional airports need government assistance to achieve the same level (again based on regional needs and not a 'one size fits all' approach).
	The current focus of the aviation security system is regular passenger transport services. Should it be extended to include aircraft providing, for example charter services?	Some charter services are carried out by aircraft that are as big and carry as many passengers as an RPT jet aircraft. A risk analysis of the operation, its own security checks, whether it is a closed or open charter. This decision should be risk based against the operation.
	Should the cost of aviation security at particular airports be more evident to passengers?	Yes. What is the security outcome, passengers just want to know that there is security in place, and what the cost of the ticket is. How that is divided up, has no bearing on whether they will fly or not from a particular airport. Airports are too often blamed for high 'taxes' which incorporate mandated security and other costs which are not imposed directly by the airport. This can be used in negative PR by airlines and does not lead to total transparency to consumers.
	Could industry manage its costs more effectively?	Security processes are mandated, industry puts in place the security measures required to meet the requirements of government. All costs are associated with these measures, no more than is required.
Technology	Should we introduce new technologies for passenger screening that can improve processes even if they are more invasive or costly?	The regulations should be focused on the security outcome. Airports should be given the latitude to assess the acceptance of those procedures by our customers. We are focused on the security outcome and the customer experience.
	Biometrics are an effective way to manage access arrangements at airports and an improvement on current practice. Is there value in introducing biometrics into Australia's airports for people working there?	All new technology should be embraced to meet the security outcome. Technology is the future for aviation security, keeping in front of any forces that may want to inflict harm to passengers is through technology. A good government education program prior to any new technology, and its worth, would pacify any passenger

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		concerns with invasive technology. Understanding why is the key.
	Should we expect the same security technology standards from all airports regardless of location, the traffic levels at the airport, and the costs?	Again the security outcome should be met, however a more tiered system is appropriate based on risk profiles.
Passenger experience	How can we improve/optimize passenger screening arrangements within Australia?	Needs to be risk based, a regional airport such as Mount Isa, could not afford to put into place the same security levels as Sydney without government support. Or airlines would refuse to fly into a port that was financially unviable. Furthermore, screening can be optimized by sharing the results of the security process. By that we mean indicate the number of persons prevented from travel with the arrangements in place. Then the travelling public will see the value in airport screening.
	Should special arrangements be put in place to enable frequent travellers who understand security requirements, often business travellers, to move through passenger screening more quickly? What type of special arrangements, if any, would be appropriate?	All regular passengers understand the arrangements and are quickly processed. We do not need to add complexity to the processing of passengers because of frequent flyers. The process is straight forward. Technology and government support, understanding the profile of the travelling passenger.
	Do we adequately address the requirements of people with special needs?	Yes we do. Airlines are a difficult process for people with special needs, as it is a confined environment, with difficult requirements. I think understanding of the process for people with special needs, by industry and the passenger themselves is important, and should always be considered by both.
	Are we consistent enough in the delivery of services to passengers?	As far as screening is concerned we are very consistent. As far as the issuing of ASICs there are some inconsistencies on how Inspectors interpret the regulations. As far as security is concerned no, training methods differ from airport to airport, and presentation of screening staff is also inconsistent, plus the settings of equipment will be different as well. With all of the above, we need a national consistency to save on confusion and frustration by passengers.
Legal requirements	Is the current regime too heavy handed? Could it provide a similar level of protection while reducing demands on passengers, industry and workers?	The current system has been accepted. The rigor of the audit process has ensured a good security culture. Government tends to react to every incident around aviation

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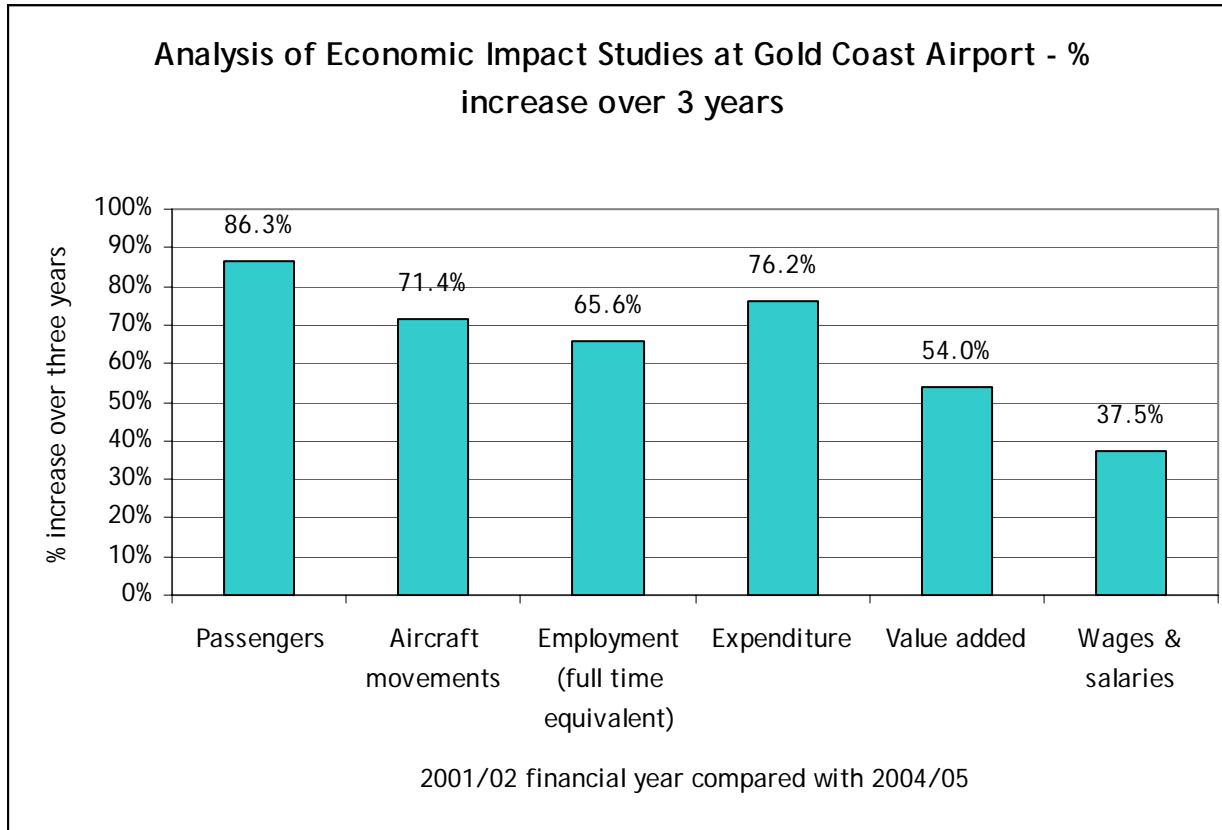
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		security, more needs to be considered against the security threat risk environment against Australia. People will pay for security if it is required, but a well balanced security environment needs to be considered against the risk and the actual threat.
	Are the legislation and regulations in need of simplification?	They simply need to be focused on the outcomes to allow the industry to develop best practice strategies to meet the security outcomes. They are too open for conjecture; airports can make their own interpretation on some issues. Simplification and less conjecture is needed.
Air cargo security	Has enough been done to enhance air cargo security? Are there alternative approaches to air cargo security that should be examined?	Smaller freight companies need to be considered when increasing the need for security of freight. Industry needs to be fully consulted on changes to security for smaller ports with minimal freight capacity.
	Is the Australian approach to air cargo security consistent with the highest international standards?	At larger ports no.
Identity and background checking	What can be done to improve the robustness and timeliness of background checks, particularly for applicants from overseas?	AUSCHECK is working well for GCA.
	Should the ASIC eligibility criteria be further strengthened?	Stronger checks through immigration, no issuing of ASICs unless background check is consistent with Australian checks.
	What should be the relationship between 'background checking' of staff and access control arrangements?	Access control needs to be the responsibility of airports and not its tenants. Tenants need to understand the benefits on centralized access control. It should remain the same, background checks should be the responsibility of the policing and government agencies, and the access control should remain the airport authority's responsibility. If the same card is used for both, that also would be the airport authority's decision.
	Should background checking be extended to include managers/directors of companies with employees who hold an Aviation Security Identity Card?	All Industry Participants should be required to apply for ASIC cards.

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Summarising the two economic impact studies for GCA:



Passengers, the major driver, increased 86% in total, over the 3 years.

The benefits to the local economy are:

- 54% increase in the amount of value added to local economies as a result of the airport operation
- 66% increase in employment, based on the number of jobs
- However 38% increase in the volume of wages & salaries paid
 - Possibly reflecting that growth being in terms of ground handling positions/low cost carriers etc.

Relevance to the submission:

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Proof that the privatisation of the airport and the emergence of low cost carriers has significantly benefited the local economy.

Reflects that airports, left to their own management and pricing, generate a competitive environment for airlines, which ultimately lead to economic growth in direct and indirect impacts for the local economy.

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Attachment 1.

ACTS ACT AND LOCAL AUTHORITY PLANNING SCHEME COMPARISON

The current approval system for non-airport development on airport land can be seen to be operating effectively, requiring comprehensive documentation and consultation, and it is certainly not one in which "rubber-stamping" by the Minister is a feature. For example, a proposed DFO outlet shopping centre at Hobart Airport was significantly reduced in size by a condition imposed by the Minister on the MDP approval in October 2007, as a result of submissions during the consultation process. It is also not uncommon for the Minister to require sometimes fairly substantial changes to draft airport master plans presented for his approval.

Set out below is a summary of the procedures for plan preparation and planning approvals under the Airports Act land use, planning and building controls on the one hand, and the Queensland State/Local Government statutory planning framework on the other.

The Airports Act Approval and Consultation Process

- The preparation of the airport master plan is a highly participatory process. The draft plan is required to indicate to the public the intended uses of the site for the next 20 years and ensure that these are compatible with areas surrounding the airport. Among other things, the plan must address the company's intentions for airside and landside land use and related development and land planning/zoning aspects, and assess environmental issues and measures for dealing with them.

Before presenting the draft master plan, the airport is required to notify the relevant State Minister(s) and agency or agencies responsible for town planning, as well as each local government body. The draft master plan is notified to the public and submissions invited by newspaper advertisement, and is required to be available for inspection and purchase (as well as free download) for a period of 60 business days.

Public submissions, and those by the government agencies consulted, are sent to the Minister with the draft master plan, as well as the airport's summary of those submissions and the airport's responses to them, demonstrating that they have been given "due regard". In turn, the Minister is to give 'due regard' to issues including the effects of the plan on the use of land in areas surrounding the airport.

The process for minor variations to an airport master plan also involves a public consultation period, in this case for 15 business days.

An approved master plan remains available for inspection or purchase during the period it is in effect.

- Development on the airport land must be carried out in conformity with the approved master plan. However, construction of a building (other than a terminal building) which exceeds a cost of \$20 million is not to be undertaken unless a major development plan (MDP) is prepared, notified and approved by the Minister. The plan is required to contain a detailed outline of the proposal, including addressing its level of consistency with the locality's planning schemes.

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Referral is required to State and Local Government agencies as for master plans, and again the requirement for public notification and availability of the plan for inspection and purchase is 60 business days. Any written submissions by members of the public, with a summary and commentary on those submissions, are to be included in the package of material provided to the Minister.

The Minister's approval of an MDP can be subject to conditions, and the decision is final. There is no right of appeal against a decision of the Minister to refuse or condition a master plan or MDP (in contrast with local government planning decisions in every jurisdiction, which are subject to a right of appeal by applicants to the relevant court or tribunal).

- There is a significant opportunity for interested members of the public, government agencies and industry groups, etc to make known their views in respect of a proposed development on airport land, at the master plan preparation stage and also, if the proposal exceeds a value of \$20 million, or does not conform with the master plan, when an MDP is prepared. In reality, there are also the usual un-legislated opportunities to participate in the on-airport development process, through direct representations to the Minister (as practiced for example by the shopping centre owners' lobby groups).

Local Government Statutory Planning Process

There are entirely different State-mandated statutory planning systems operating in each State and Territory. This analysis principally focuses on the system in operation in Queensland.

- Under the Integrated Planning Act (IPA), each local authority is required to have in place a planning scheme. In the first instance, the process for preparing the planning scheme involves public exhibition of broad proposals and the core matters which the scheme will address. This statement is not intended to be site-specific, and is notified for a preliminary consultation period of 40 business days, during which period written submissions can be made, and these are required to be considered by the local government. A decision is then to be made by the Council to prepare a planning scheme.
- Public notification of a draft planning scheme takes place upon approval from the Minister, a decision which can be subject to conditions (eg in relation to the scheme content as to State interests). Minimum period for public consultation for the new planning scheme is 60 business days. Submissions are required to be considered by the local government, which then decides whether or not to proceed, and if so with or without modifications. The Minister then approves adoption of the scheme.
- The planning scheme establishes required levels of assessment for all land uses in each part of the planning scheme area (zoning). These levels, from least to most onerous, are "exempt", "self assessable", "code assessable" and "impact assessable". There are no explicitly prohibited land uses, although in most planning schemes it is made clear that land uses not designated as preferred or desirable in a locality are discouraged.

For exempt and self assessable development, no application to the local authority for planning approval is required, although in the case of the latter a proposal must conform with stipulated (generally not highly restrictive) code requirements. For code assessable development, an application for planning approval is required, however its assessment is not merit-based, but

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in most instances involves only ascertaining whether a proposal conforms with code requirements that are determined to be applicable for the particular location and land use.

A full merit-based assessment occurs in the case of impact assessable development (which in some cases can effectively represent a "rezoning" of land), in which attributes such as suitability, scale, impacts and the like are relevant. It is only impact assessable applications which are subject to public notification for submissions, for a period of 15 business days (but in certain limited cases, 30 business days).

It is open for an applicant to appeal against the refusal of an application or the imposition of conditions for any assessment status, and for third party appeals against the approval of an application, but only an application or part of an application subject to public notification (ie impact assessable).

- The NSW planning system, which is applicable to part of the Gold Coast airport site is completely different from the one applying in Queensland. This system can be outlined in detail if required, however there are a couple of notable matters worth highlighting in differentiation from the Airports Act regime. The Minister can, and commonly does, designate development as State Significant, whereby decision-making reverts to the Minister. Except where it is necessitated by State legislation, the "calling in" of an application generally signals that the proposal is viewed favourably. While there is a notification procedure there is no right of appeal. Further, the NSW planning system as a whole generally does not allow for any rights of appeal by third parties (ie objectors) for applications determined either by a local authority or by the Minister.