

3 June 2022

Director, Airport Reform, Sunsetting and IFAM Section
Airports Branch
Department of Infrastructure, Transport, Regional Development and Communications
GPO Box 594
CANBERRA ACT 2601

By email: aviationreform@infrastructure.gov.au

Dear Sir/Madam,

Re: Modernising Australia's airport regulations (Stage 1b)

Airport Development Group (ADG) welcomes the opportunity to provide comment on modernising Australia's airport regulations Stage 1b (modernising the Act including examining infringement notice schemes and the definition of an airport site).

ADG owns and operates Darwin International Airport, Alice Springs Airport and Tennant Creek Airport, as well as strategic and diverse assets across the Territory including hotels and resorts, utilities and a significant property portfolio. ADG has been part of the Northern Territory community for over two decades and is one of Northern Australia's largest companies.

Stage 1b

ADG provides the following feedback regarding Stage 1b of the sunsetting review process:

- ADG believes it is important to maintain the ability of controlling on-airport activities (e.g. car parking breaches) through the issuing of infringement notices.
- It is ADG's intention to recover all costs associated with controlling these on-airport activities through the issuing of infringement notices.
- ADG suggests the infringement process could be enhanced through further stakeholder engagement.

Other matters for consideration

Although not part of the Stage 1b scope, ADG believes the regulatory reform process should also allow for airport-lessee companies to have the opportunity to take up the option of extending their head lease to the full 99-year term as soon as possible. The initial lease terms for ADG's three airports have less than 30 years until expiry, putting increasing constraints on future on-airport development plans. Extending the head lease to the full term would provide certainty for future development and investment, as well as increasing economic resilience to shock events such as the COVID-19 pandemic.

ADG looks forward to continued involvement in future consultation stages.

Yours sincerely

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

Ross Baynes
Executive General Manager – Property & Terminal