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DPTI

21 September 2018

State Planning Commission
Attention: Tim Anderson QC, Chair

Via email: DPTI.PlanningEngagement@sa.gov.au

Dear Tim

Adelaide Airport Ltd - Response to Draft State Planning Policies

I am writing on behalf of both Adelaide Airport Ltd and Parafield Airport Ltd (together AAL) as operators of Adelaide and Parafield Airports in relation to the Draft State Planning Policies recently released for consultation by the Department of Planning, Transport and Infrastructure (DPTI) and the State Planning Commission.

AAL appreciates the opportunity to provide comments in relation to the Draft State Planning Policies. We understand that the Draft State Planning Policies will form the highest order policy framework for South Australia, guiding a suite of more detailed planning controls and assessment processes.

I would like to express our appreciation for the opportunity AAL was given to provide input into the earlier draft of *State Planning Policy 11 Strategic Transport Infrastructure* (Draft SPP 11). Unfortunately, it appears that the comments provided by our consultants (AECOM – letter dated 31 May 2018) have not been incorporated into the recent draft State Planning Policies. These comments are still relevant and have been included in the following submission.

Adelaide and Parafield Airports are important strategic transport and economic hubs for Metropolitan Adelaide and the State, and it is positive that our State's pre-eminent commercial and general aviation airports are identified as 'Strategic Airports' within Draft SPP 11.

It is important that effective protection mechanisms are incorporated into the State's planning system to recognise, protect and allow for the ongoing operation and growth of Adelaide and Parafield Airports. Draft SPP 11 provides an opportunity to better integrate the requirements for protection of aviation activities, guiding more detailed planning instruments such as the State Atlas, Regionals Plans and the Planning and Design Code.

However, AAL notes that the strategic transport infrastructure policies listed under Draft SPP 11 have been diminished further in detail from the early draft that AAL commented on. Such policies provided inadequate guidance to:

- Protect strategic transport corridors
- Manage interface issues between strategic transport infrastructure and sensitive land uses
- Facilitate appropriate value-adding development adjacent to strategic infrastructure
- Protect aviation operations and airspace.

AAL suggest that Draft SPP 11 should reference the National Airports Safeguarding Framework (NASF), which is intended to drive improvements in planning outcomes, both on and off airport, and improve the safety and viability of operations at all Australian airports.

The Non-statutory Guidance Notes provided in Draft SPP 11 advises that:

"Code policy should identify operational airspace and ensure that the Obstacle Limitation Surface for leased Federal and other strategic airports is contained within an Overlay."

AAL believes that reference to the code policy should be expanded to reference the full suite of NASF Guidelines.

AAL encourages DPTI and the State Planning Commission to further consider the approach taken by the Queensland Government in relation to its State Planning Policies. Additional detailed policies and guidance material is provided in the Queensland system. Recognising the importance of strategic transport infrastructure, the Queensland system has included three State Planning Policies relating to:



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- Strategic transport infrastructure – covering roads, busways, light rail, passenger and freight rail, and active transport
- Strategic ports
- Strategic airports and aviation facilities.

The third of these State Planning Policies is most pertinent to the interests of AAL in that it provides significant guidance on the importance of airports, and effectively integrates the NASF Guidelines. We see it as essential that similar policies are included in Draft SPP 11. Specifically, the 'Strategic airports and aviation facilities' policy covers:

- Identifying strategic airports and aviation facilities, and associated obstacle limitation surface (OLS) or height restriction zone, public safety areas, lighting area buffer zones, wildlife hazard buffer zones, ANEF contours, and building restricted areas
- Protecting strategic airports by ensuring:
 - Development and associated activities do not create incompatible intrusions or compromise aircraft safety in operational airspace
 - Development avoids increasing risk to public safety in public safety areas
 - Development mitigates adverse impacts of aircraft noise and is compatible with forecast levels of aircraft noise within the 20 ANEF contour or greater for strategic airports.
- Protecting aviation facilities by ensuring development and associated activities within building restricted areas do not adversely affect their functioning
- Facilitating development surrounding strategic airports that is compatible with, depends upon or gains significant economic advantage from being in proximity to a strategic airport, or supports the airport's role as a freight and logistics hub
- Identifying and protecting key transport infrastructure and corridors (passenger and freight) linking strategic airports to the broader transport network.

AAL also encourages DPTI and the State Planning Commission to ensure that strategic transport infrastructure is given due consideration in other Draft State Planning Policies, in particular *Draft SPP 1 – Integrated Planning* and *Draft SPP 6 – Housing Supply & Density*.

Finally, we note that the proposed response within the *Draft Integrated Movements Systems Policy Discussion Paper* to transition the policy intent of the current Airfield Zone into the Planning and Development Code and review the permissible uses in this zone is appropriate for all South Australian airports, excepting for Commonwealth owned airports such as Adelaide, Parafield and Defence airports. These are controlled under separate Commonwealth legislation. A similar approach to that taken by the Victorian Government (Victorian Planning Provision 45.09 Melbourne Airport Environs Overlay), where it references guidance material (ie NASF Guidelines, Melbourne Airport Master Plan and the Melbourne Airport Strategy), may reduce jurisdictional confusion.

AAL would appreciate the opportunity to further discuss these issues with DPTI and the State Planning Commission.

I look forward to hearing from you shortly.



Mark Young

Managing Director
Adelaide and Parafield Airports

cc: Anita Allen, [REDACTED]

Mr Pat Howard, SAPN