22 February 2019

Mr Michael Lennon, Chair
State Planning Commission
C/o DPTI Planning Engagement
GPO Box 1815
ADELAIDE SA 5001

By Email: DPTI_PlanningEngagement@sa.gov.au

Dear Michael

Productive Economy Policy Discussion Paper

I am writing on behalf of both Adelaide Airport Limited and Parafield Airport Limited (together AAL) as operators of Adelaide and Parafield Airports in relation to the Productive Economy Policy Discussion Paper 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 Discussion Paper and wishes to commend the South Australian Government and the State Planning Commission on this initiative to provide further detail regarding the policy matters that will be addressed in the new Planning and Design Code.

We have reviewed the Discussion Paper and are pleased to see that it outlines the key issues and opportunities associated with enhancing South Australia's economic competitiveness.

However, AAL considers that as a result of the global growth in aviation, the importance of connecting Adelaide locally, nationally, and globally, and the importance of tourism and international education to the growth of South Australia, we seek greater consideration of the ongoing operations and growth of our key airports – including Adelaide and Parafield Airports.

The following comments are provided in relation to the three key sections of the Discussion Paper:

Part 1 – Review of Economic Trends and Opportunities

The first part of the Discussion Paper includes a review of current local, national and global economic trends and opportunities for growth and innovation. This section has been driven primarily by research undertaken by Deloitte Access Economics, and recognises the future industry-wide economic advantages that South Australia can deliver.

In this regard, the role of Adelaide Airport in connecting our city to regional South Australia, nationally and globally, for business, tourists and freight is critical, and should be given greater status.

Adelaide Airport is Australia's fifth largest airport, with over eight million passengers annually (including over one million international passengers). Being just 6 km from the Adelaide CBD, Adelaide Airport is a major economic hub for the State, directly and indirectly employing almost 18,000 FTE jobs and contributing around 2.1% to the Gross State Product.
Parafield Airport is the principal general aviation and pilot training airport in South Australia, providing world-class pilot training facilities for our local and global aviation markets.

Whilst recognising a number of competitive advantages that South Australia offers, including international education, tourism and visitor attraction, Part 1 of the Discussion Paper should provide a greater focus on the importance and growth of aviation to the State.

**Part 2 – Role of planning in supporting economic opportunities**

The second part of the Discussion Paper provides an overview of the planning and development system’s impact on economic drivers, covering the following key themes:

- Theme 1 – Supporting and growing key industries
- Theme 2 – Linking people to jobs, goods and services
- Theme 3 – Providing infrastructure to enhance our liveability
- Theme 4 – Facilitating innovation and enabling investment

AAL would encourage that further consideration be given to the role and function of both Adelaide and Parafield Airports, and the importance of:

- Supporting their growth and development
- Protecting such vital infrastructure from encroachment from development, which may impinge their growth and development

**Part 3 – Transitioning to the Planning and Design Code**

We fully support an improved approach to planning policy in areas surrounding Adelaide and Parafield Airports to protect ongoing aviation operations in line with the National Airports Safeguarding Framework (NASF).

There is a need to transition the policy intent of the Airfield Zone, with the inference that this Zone will be applied to Adelaide and Parafield Airports within the new Planning and Design Code. Both airports are located on land owned by the Commonwealth Government; the State’s planning legislation does not apply for aviation and non-aviation development within the boundaries of the airports’ land. Instead, planning and development matters are governed by the Airports Act 1996.

The Airports Act requires AAL to prepare master plans for each airport that set out our development objectives for the next 20 years. A land use plan is prepared for each airport’s master plan that aligns to the State’s planning system.

The [Parafield Airport Master Plan 2017](#) was approved by the Commonwealth Minister for Transport and Infrastructure on 19 January 2018. It provides a 20-year development vision for the airport and a land use planning framework consistent with the State’s current planning system under the Development Act 1993. AAL reviews and assesses proposals for development on-airport in accordance with the 2017 Master Plan in a manner similar to the current development assessment regime under the Development Act.

AAL is currently reviewing the master plan for Adelaide Airport, with the expectation that a Preliminary Draft Master Plan will be released for public exhibition in mid-2019. The updated master plan will include a land use plan that builds upon the current framework contained in the [Adelaide Airport Master Plan 2014](#).

We believe that it would be more accurate and appropriate for the Planning and Design Code to reference the relevant airport master plan, rather than provide a zoning and policy framework that is not applicable to on-airport development. In this way, the Airfield Zone can contain a policy framework that is more applicable to the smaller regional airports and aerodromes around South Australia. It also allows the focus of all stakeholders in our airports to be turned to ensuring an appropriate policy framework for the areas surrounding each airport in accordance with the NASF guidelines.
We would be pleased to elaborate further on the economic benefits that Adelaide and Parafield Airports provide to South Australia.

Please do not hesitate to contact me to discuss our submission further.

Yours faithfully,

Alicia Bickmore
Legal and Corporate Affairs Manager
ADELAIDE AIRPORT LIMITED