28 February 2020

Mr Michael Lennon
Chairman
State Planning Commission
Level 5, 50 Flinders Street,
ADELAIDE SA 5000

By email: DPTI.PlanningReformSubmissions@sa.gov.au

Dear Michael

RE: Planning and Design Code Phase 3 Submission – Adelaide and Parafield Airports

1.0 Context

We write on behalf of both Adelaide Airport Limited and Parafield Airport Limited (together AAL) as operators of Adelaide and Parafield Airports. AAL purchased the operating leases for Adelaide and Parafield Airports in May 1998, to operate both airports for the next 50 years with an option for a further 49 years.

Adelaide Airport is currently the fifth-largest domestic and international airport in Australia. It is the aviation gateway to South Australia and processes more than 8 million passengers annually.

Adelaide Airport is one of the most significant economic precincts in South Australia and is the State’s largest single site employment precinct directly employing more than 10,000 people on and off airport, and contributing to the generation of a further 12,700 induced jobs. The airport contributes $3 billion to the South Australian economy each year, equivalent to 3.1 per cent of Gross State Product. It is also a critical transport hub creating new export opportunities and inbound tourism opportunities.

Adelaide Airport has transitioned from an aviation and infrastructure facility to a broad-based economic activity node, encompassing a variety of aviation and non-aviation services, facilities and developments.

Parafield Airport is South Australia’s premier general aviation airport and is a major world standard international training airport. The provision of commercial, retail and industrial activities contribute to the viability of the airport as a business enterprise and provide an economic core and employment centre for the northern suburbs of Adelaide and beyond.

AAL has carefully considered the draft Planning and Design Code (PDC) and appreciates the briefings provided by the staff of the Department of Planning, Transport and Infrastructure (DPTI). We recognise that planning is not static and that dialogue between
AAL and DPTI will need to continue as an ongoing focus, in order to achieve optimal policy outcomes for both parties.

In reviewing the draft PDC, we have primarily considered the potential implications on aviation related matters, however we have also considered the potential implications on the property leased by AAL, at both the Adelaide and Parafield Airports.

We provide the following summary of the issues identified.

### 2.0 Commonwealth Facilities Zone

We have reviewed the draft Commonwealth Facilities Zone and generally support the simplicity of the zone.

AAL consider the notation under DO1 (reproduced below) is particularly relevant and strongly supports its retention and as such recognises that substantive exemptions apply where development does not require approval under the Planning, Development and Infrastructure Act (PDI Act).

**DO 1**

A zone accommodating nationally significant aviation and defence related activities.

**[NOTE: Land in the zone is subject to Commonwealth laws where development may occur without the need for an approval under the Planning, Development and Infrastructure Act 2016. In circumstance where a class of development is proposed that is subject to State planning laws, the development is subject to assessment against the Planning and Design Code]**

In order to better reflect the existing and planned function of both Adelaide and Parafield Airports, we request that one additional Desired Objective and additional associated Performance Objective be incorporated within the zone. The purpose of the additional policy is to clearly recognise the wide range of activities anticipated by the master plans for both Airports, which are not aviation or defence related.

The additional policy we recommend is outlined as follows.

**DO 2**

A zone that includes a range of employment, community, aviation educational, innovation, recreational, tourism and entertainment facilities.

**Performance Outcomes and Deemed to Satisfy / Designated Performance Outcome Criteria**

**Land Use**
PO 2.1

A mix of employment, retail, community, health, aviation educational, recreational, tourism and entertainment facilities.

DTS/DPF 2.1

None are applicable.

3.0 Adjacent Zones

We have undertaken a review of the zoning which is proposed in the broader locality surrounding both Adelaide and Parafield Airports. We note that the intent of the draft PDC is to generally provide a ‘like for like’ zone outcome. Whilst this may generally be the case, we note that there are locations in the broader locality surrounding Adelaide Airport, where there appears to be some uplift in relation to housing density.

Whilst we do not have the resources to quantify the potential density uplift in fine grain detail, the enclosed map shows where we have identified a potential increase in density, having regard to either the density statements or site area provisions contained within the existing and proposed zones adjacent to Adelaide Airport.

It is evident that from a spatial perspective, the area of potential density increase is reasonably substantial.

AAL considers that any uplift in density needs to be carefully analysed to ensure that there is no significant increase in housing in potentially sensitive locations. Such could prejudice the ongoing aviation function of Adelaide Airport, a matter of critical importance to AAL, the State and the Commonwealth, noting the economic and social significance of the airport and the need to ensure no further restrictions on passenger numbers and freight movements.

AAL submit that ahead of finalising the draft PDC that DPTI commit to carefully review the draft zoning to ensure the subtle changes in density expectations across many policy areas does not result in any significant quantum of uplift, particularly in locations subject to the Australian Noise Exposure Forecast (ANEF).

4.0 Airport Operations/Aviation Related Overlays

We recognise and appreciate the consultation process undertaken by DPTI in relation to the various Overlays which relate to aviation activity, including:

- Aircraft Noise Exposure Overlay;
- Airport Building Heights (Aircraft Landing Areas) Overlay;
- Airport Building Heights (Regulated) Overlay; and
- Buildings Near Airfield Overlay.
We note that the spatial coverage shown on the draft PDC Overlays is subject to review by DPTI.

We further note there is an intention for a Practice Guide to be prepared in order to interpret the airport-related overlays. We consider such is imperative in order to inform all stakeholders how the Overlays apply, including the potential need or otherwise for referrals.

We understand that several NASF Guidelines (Guidelines G, H and I) have not been incorporated into the initial version of the PDC, however such may be considered in subsequent iterations of the PDC. Given the recently announced delay in the PDC, AAL request that the potential amendments be incorporated prior to its finalisation and release.

In respect to the specific overlays, AAL request the following outcomes:

**Aircraft Noise Exposure Overlay**

AAL understand that it is proposed to amend the draft Overlay to allow a Deemed to Satisfy (DTS) assessment pathway within ANEF 20 and ANEF 25 contours. Overall, we understand the DPTI preferred pathway is represented as follows:

*Deemed-to-Satisfy Pathway*

ANEF 20:
- No additional planning or building assessment required;

ANEF 25:
- No additional planning assessment required;
- Additional building assessment required
  - DTS building requirements for noise attenuation based around modification of *MBS 010: Construction requirements for the control of external sound* - to align with AS 2021-2015

*Performance Assessed Pathway*

ANEF 30 and above:
- Performance Assessment required for noise sensitive development;
- Performance Assessment of Land Division to ensure noise impacts and appropriateness of land use is considered as early as possible;
- Practice Direction may be developed to provide guidance around performance assessment and requirements for acoustic reports.

We further note that in relation to Adelaide Airport, consideration is being given in respect to:
- the use of MBS 10 with modifications to address aircraft noise for DTS; and
- retaining performance assessment on ANEF 30+. 
From an AAL perspective, residential development within the 30 ANEF should be restricted as compared to performance assessed. Adelaide Airport should not be the subject of potential further constraints on passenger numbers or freight growth, which could be a consequence of additional population and housing within this noise contour. AAL requests strong direction from the State Government to ensure that the significant economic and social contribution of Adelaide Airport to the State is not diminished.

AAL also requests that any performance assessed development proposals are referred to AAL for noise assessment.

**Airport Building Heights Overlay**

It is understood that DPTI is in the process of replacing Development Plan height mapping with actual OLS for Adelaide and Parafield Airports, an outcome which AAL supports.

AAL submit that further work is required to ensure that the referral process is streamlined and that by working with CASA, Airservices Australia and the Commonwealth Department of Infrastructure, Transport, Regional Development and Communities, potentially an Overlay similar to Defence Aviation Area Overlay would ultimately be more appropriate.

**Building Near Airfield Overlay**

The initial Overlay applies to area within 6km of key airfields. DTS policy has been introduced for managing planning issues including outdoor lighting and wildlife strike. We note that post Phase 2 consultation, DPTI have agreed to:

- Amend DTS 1.1 to relate only to non-residential outdoor flood lighting;
- Amend DTS 1.2 to reference wildlife strike instead of birds;
- Remove DTS 1.3 (otherwise addressed by Aircraft Noise Exposure Overlay).

The amended policies need to respond to the following NASF Guidelines:

C – Wildlife Strike: (limits specific land uses within 3km – otherwise performance assessed)

E – Lighting: (DTS requiring no outdoor floodlights tied to non-residential development within 6km – otherwise performance assessed).

**5.0 Airport/Commonwealth Property Related Overlays**

We have identified that there are a number of Overlays contained within the draft PDC which spatially cover the property of Adelaide and Parafield Airport.

Whilst AAL accepts that the airport land being integrated into the draft PDC at a zone level, the notation in the zone makes clear that a development exemption applies under the Airports Act 1996.

In contrast, the Overlays do not reference the exemption, with it inferred that the Overlays can influence development of the airport land.
For clarity, AAL requests that the spatial coverage of the Overlays be limited to exclude the property boundaries of both Adelaide and Parafield Airports. Overlays impacted by this request include:

- Advertising Near Signalised Intersections;
- Airfields;
- Buildings Near Airfield;
- Defence Aviation Area;
- Hazards (Flooding);
- Major Urban Transport Route;
- Regulated Trees;
- Prescribed Wells Area;
- Traffic Generating Development;
- Water Resources.

We would be pleased to further meet with DPTI staff in order to provide further detail in respect to this submission.

Please do not hesitate to contact Jenny Harris on [contact information] if you require any further information.

Yours sincerely

Adelaide Airport Limited

Kym Meys
Executive General Manager Planning and Infrastructure

Enc: Density Analysis – Adelaide Airport