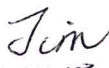


15 November 2019

Mr Jim Wolfe
General Manager
Aviation Environment
Department of Infrastructure, Transport, Cities and Regional Development
GPO Box 594
CANBERRA ACT 2601

safeguarding@infrastructure.gov.au


Dear Mr Wolfe,

Review of National Airports Safeguarding Framework

Thank you for the opportunity to input to the review of the National Airports Safeguarding Framework (NASF) which has been in force since 2012. We understand that this is an issues identification stage of the review, prior to the release of a Discussion Paper.

The Australia Local Government Association (ALGA) is the national voice of local government in Australia, representing 537 councils across the country. In structure, ALGA is a federation of state and territory local government associations. ALGA was established in 1947 and throughout its history has been closely involved in issues of national significance affecting the local government sector as a whole.

This submission should be considered in conjunction with any submission made by State/Territory Local Government Associations or individual or regional grouping of local governments.

Local governments in State jurisdictions are generally responsible for managing planning and development around airports and also lease, manage or own airports of varying scales of operations. As such local governments have an important role in ensuring the future operations and safety of airports as well as balancing this with economic and social impacts on existing and future residents and businesses. Airports are critical elements of defence, passenger and logistical infrastructure and for regional communities are also important transport hubs for social and economic connections to services including health and education beyond their communities.

The NASF is a national land use planning framework that aims to:

- improve community amenity by minimising aircraft noise-sensitive developments near airports; and
- improve safety outcomes by ensuring aviation safety requirements are recognised in land use planning decisions through guidelines being adopted by jurisdictions on various safety-related issues.

In general, ALGA's understanding is that the NASF has been working well where the relevant principles have been incorporated into State Government planning policies or guidelines which councils must consider in preparing local or regional planning documents. This approach has therefore provided consistency and certainty for councils, developers and residents. However, whilst this is the preferred approach and it needs to be understood that there can be a "lag" time between changes to the NASF, updates to State Planning Policies and final incorporation into local government planning documents, the latter often involving community consultation. In addition, in some jurisdictions only parts of the NASF framework might apply, given the scale and nature of airport operations.

From advice provided to ALGA there has been variable uptake by State Governments. For example, in Queensland the NASF is incorporated into the State Planning Policy - Strategic Airports and Aviation Facilities and so provides clarity for councils. In Western Australia there are two relevant State Planning Policies (for Perth and Jandakot airport), which are only focused on noise and addressing its impact. The Western Australia Government is working on a state-wide airports policy and still considering how closely it will be aligned to the NASF. In South Australia the NASF is not proposed to be included in the Planning and Design Code. This situation is not ideal, given the importance of aviation to the State economy, that it affects multiple communities and is not a single Council issue. It's also critical for the new Western Sydney Airport that appropriate protections are in place to protect airport operations and planning for future development.

ALGA therefore supports a standardised policy approach and leadership from State Governments to incorporating the NASF framework into relevant planning policies, to assist Councils with planning and development decisions. **On this basis, ALGA recommends the National Airports Safeguarding Advisory Group (NASAG) undertake an audit of how the NASF is being incorporated into State Government planning policies and whether further action should be considered if this is not occurring.**

ALGA also notes thus far that four local councils (City of Townsville, Cockburn Council, Camden Council and Livingstone Council) have raised issues for consideration in their individual submissions. Further detailed comments from Salisbury City Council are attached and are submitted for your consideration and feedback.

Please contact Kym Foster, Director – Transport Policy on telephone 02 6122 9432 if you would like to discuss further.

Yours sincerely,


Adrian Beresford-Wylie

Chief Executive

ALGA has received the following comments from the Salisbury Council via the Local Government Association of South Australia and requests consideration of these comments by NASAG:

- The need for NASAG to investigate land value impacts on existing land owners and businesses within the designated areas if Public Safety Zones are applied;
- Recognition of the need for authorities (including Councils) to have access to relevant information and expertise, and the need for funding for modelling to fully understand the relevance to specific airports;
- NASAG obtain legal advice regarding councils' potential legal liability;
- How changing operations at airports are consulted on, managed and incorporated into the identified public safety zones;
- Rights and triggers for Councils and Authorities to impose future restrictions on airports should the Public Safety Zones result in unreasonable impacts upon affected properties;
- How clear and unambiguous information is relayed to the affected communities and businesses by the Federal authorities that this is a result of a Federal direction;
- Recognition and acceptance by the Federal Government that compulsory acquisition, compensation and relocation is available to the affected property owners and occupiers from Federal funding, with an agreed framework of eligibility;
- Recognition that a long-term Council Development Plan Amendment has been significantly impacted as a result of this Guideline; and
- Recognition by the Federal Government, NASAG, and the State Planning Ministers that the incremental release of the various Guidelines and regulations for the protection of airports have a significant incremental and increasing impact on the communities around airports. This is multiplied in the City of Salisbury's case, due to the presence of two significant airports adjacent to City.