

26 July 2010

Committee Secretary Senate Rural and Regional Affairs and Transport References Committee PO Box 6100 Parliament House Canberra ACT 2600 Australia

Via email: <u>rrat.sen@aph.gov.au</u>

RE: Hobart International Airport Pty Ltd Airport Amendments Bill 2010 Submission

Hobart International Airport Pty Ltd ("HIAPL") welcomes the opportunity to make a submission to the Senate Standing Committee on Rural and Regional Affairs and Transport in relation to the Airport Amendments Bill 2010 ("the Bill").

HIAPL welcomed the Government's release of the National Aviation White Paper Policy, and strongly supported the consultative approach taken to develop the Paper, we would however like to state that there was no consultation undertaken in the development of the Bill and that had there been consultation, a number of the issues outlined in this submission may have been avoided altogether.

HIAPL makes this submission in respect to the amendments outlined in the Bill and the terms at which they are currently drafted. In drafting this submission, it is apparent that many of the regional issues outlined in the Bill are of greatest direct relevance to HIAPL.

HIAPL is a capital city Airport, however the current size of the operation and the passenger and aircraft movement through the Airport make it more comparable to regional Airports throughout mainland Australia. In consideration of the size and nature of Hobart Airport, it is critical to state that resources are limited, and areas of the Bill that impose significant resource implications are of greatest concern.

Two key areas of concern within the Bill are the increased resource burden on Airport planning and development processes through the additional requirements, and the ambiguity of the terminology detailed in the Bill leading to a lessened level of certainty in all planning and development for the Airport.



Master Plans

HIAPL supports the inclusion of the Airport Environment Strategy into the Master Plan process, however would like to state that there should be mechanisms built into the Master Plan approval process that prevents delay in approval on Master Plan due to Airport Environment Strategy issues.

In relation to the introduction of additional Master Plan requirements and in particular, analysis of ground transport and off-airport development inclusions, this will add significant work to the current comprehensive planning process, and HIAPL would request that more definitive details are placed around the level of analysis required.

In reducing the timeframe for public consultation in the Master Plan process, HIAPL would support this approach, particularly if the Preliminary Draft Master Plan is deemed not to have any new or contentious issues that require extensive public consultation. Again, the reduction of this timeframe will assist in expediting the planning and development process, one which would be welcomed by HIAPL.

In reference to the Bill referring to an extension of Master Plan approval timeframes, HIAPL would propose that the current 50 days (plus stop-the-clock provisions) is more than adequate in approval time, and that the timeframes should rather be reduced to assist in timely planning and development.

In relation to commercial development on Airport, HIAPL holds great concern over the reference to "incompatible development". HIAPL appreciates the concern over incompatible development on Airports, but would suggest that incompatibility only comes with an inability to use the Airport for its intended purpose.

Incompatible Developments

The use of "incompatible" and "exceptional circumstance" terminology without further definition provides great ambiguity to the Airport and could also present restrictions in growing both aeronautical and non-aeronautical business on Airport. HIAPL would support further definition on incompatible developments, and in particular the reference to child care facilities and schools.

Major Development Plans

In relation to Major Development Plans ("MDP"), HIAPL would like to see greater clarity in reference to runway MDPs to the term "altering". HIAPL would suggest it is unreasonable to require an MDP for routine maintenance on runways and strongly oppose this.

The use of the terminology "significant social impact" is also of concern to HIAPL, this objective measure requires clear definitions and guidelines and HIAPL would



strongly suggest that consultation with relevant parties be undertaken in the development of those definitions and guidelines.

HIAPL supports the intent in the Bill to provide the Minister to waiver the need for an MDP on aeronautical development. However, HIAPL suggests that most Airport developments are undertaken to extend the operating capacity of the Airport in some form, as a result they would not support the inclusion of the requirement around waiving of an MDP if it can be demonstrated that the development will not "increase the operating capacity of the Airport" as this is unreasonable and defies logic.

Summary

In conclusion, HIAPL now goes through complex and costly processes in relation to a range of planning and development, HIAPL would not like to see further impost on the Airport in undertaking such important future development. Any impost to the Airport which is limited in human resource becomes a burden on the paying passenger and this is not something that HIAPL supports.

HIAPL welcomes the opportunity to provide further input to the Committee and the Government in development of the Bill to assist in the development and implementation of sensible policy for the future development of Airports.

Yours Sincerely,

Brett Reiss Chief Executive Officer Hobart International Airport