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MEMBER FOR GINNINDERRA

Mr Stephen Byron
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2 Brindabella Circuit
CANBERRA AIRPORT ACT 2609

Dear Mr Byron

I refer to the 2009 Preliminary Draft Master Plan released for public comment by the Airport on 10 February 2009.

The ACT Government submission reflects the Government's policy position on a number of key areas related to the Airport and is attached for your consideration.

I would also like to take this opportunity to thank you and airport management for the timely and comprehensive consultation process which was undertaken with the various ACT Government agencies.

Please note that I will provide a copy of the ACT Government's submission to the Federal Minister for Infrastructure, Transport, Regional Development and Local Government, the Hon Anthony Albanese MP, to assist with his deliberations on the development of the National Aviation White Paper.

Should you wish to discuss any of the matters that have been raised in the attached submission, please contact Mr Dan Stewart from my Department on 02 6205 0468.

Yours sincerely

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Chief Minister

- 8 MAY 2009

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**Submission by the ACT Government on
the Canberra International Airport
2009 Preliminary Draft Master Plan**

May 2009

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1 INTRODUCTION

This submission presents the ACT Government's response to the Preliminary Draft Master Plan released by the Airport in February 2009.

A submission was made on the previous 2008 Preliminary Draft Master Plan. Key issues raised in this submission included the lack of detail on key proposals such as the freight hub; the impacts of unfettered non-aviation growth on metropolitan planning and transport patterns; infrastructure demands and costs; and aircraft noise and noise monitoring. Many of these concerns remain with the 2009 Preliminary Draft Master Plan, although it is noted that it provides significantly more information than did the 2008 version.

The ACT Government supports the continuing development of Canberra International Airport as an important element of the ACT's economy. We will continue to work with the Airport's owners and the Australian Government to foster that growth. However, growth must be well planned and managed in close consultation with the ACT Government, and must take into account the economic, social and environmental impacts of growth on the ACT. In particular, the ACT Government continues to have considerable concern about the commercial and retail growth at the airport and the impact that this has on the Territory's planning policies and infrastructure.

The Draft Master Plan is a significant document for the ACT Government because it is a major source of information for guiding the ACT Government's response to the planned growth and operation of the Airport and its integration into the Territory's social, economic, and environmental planning and impact management processes.

This submission outlines the ACT Government's position on airport related matters raised by the Draft Master Plan. An overriding concern of this submission is the lack of specific detail on what is planned for the Airport, in particular the use of airport land for non-aviation purposes. As noted above, this issue was also raised in the ACT Government's response to the 2008 Preliminary Draft Master Plan, and is understood to be a key reason for the Commonwealth's refusal of this previous Master Plan

2 ECONOMIC PLANNING AND FINANCIAL MANAGEMENT

2.1 Sensitivity analysis of projected demand

The Draft Master Plan envisages multiple and expanding roles for the Airport. It seeks to grow the Airport into an international, domestic and regional hub, providing for 6.7 million passengers annually, compared with 3 million passengers in 2008. In addition, it seeks to become an overnight freight hub (see below) within five years ('Australia's first', p 79) with associated warehousing and office support, to be a key location for business, retail, industry, security and Defence and a back-up for overflow and bypass traffic from Sydney Airport. It anticipates the provision of international services by mid 2010 and completion of a major new terminal within 5 years.

The Airport is pursuing its consideration as the second Sydney airport, linked to Sydney by high speed rail. This follows statements by the Australian Government that the second Sydney airport will be in a location outside the Sydney basin. On one hand these developments would facilitate the diversification of the ACT economy by providing the opportunity for new economic activities, and complement the Government's ongoing efforts to attract new tourists, migrants and businesses to the Territory. On the other hand, these multiple roles require appropriate planning and investment to improve the surrounding infrastructure, such as the road network, which also supports the growth of Canberra and cross-border commuting from Queanbeyan and adjoining NSW.

Any variation in the rate of growth of the Airport's services will have a significant impact on planning for the scale and/or timing of investment in new off-airport roads and other infrastructure.

The ACT Government's responsibilities for accommodating this growth within its own infrastructure and centres planning would be facilitated by a more detailed statement of the assumptions used in projecting Airport growth and some sensitivity analysis of the impacts of variations in these assumptions.

In the meantime, aspects of the Draft Master Plan continue to show a lack of necessary detail for establishing the strategic directions for the Airport and the facilities and services required by its users. It is noted that clause 71(b) of the *Airports Act* requires an assessment of the future needs of civil aviation users of the airport, and other users of the airport, for services and facilities relating to the airport.

2.2 Financial impact

The ACT Government's submission on the 2008 Draft Master Plan noted that the Airport's expansion along the lines set out in the Draft Master Plan has potential budgetary implications for the Territory. This observation remains valid for the revised Draft.

Neither the Master Plan, nor any other available instrument identifies a mechanism by which the Airport contributes to the cost of upgrading infrastructure associated with its growth, particularly transport infrastructure such as roads. Similar statements may also apply to public utilities such as gas, electricity, water, sewerage and telecommunications, although these are beyond the scope of this submission.

Where it can be demonstrated that the Airport's growth contributes to the need for off-site infrastructure, there is a strong case for a proportionate contribution to the overall costs. Such contributions should cover the whole-of-life costs of the infrastructure, including ongoing maintenance costs, and not just the initial costs of providing the infrastructure. (see section 3.3). In the absence of such arrangements, the Draft Master Plan leaves much to be desired as a basis for the ACT Government's infrastructure investment planning.

3 ACT PLANNING RESPONSIBILITIES: TOWN CENTRES, LAND USE, AND INFRASTRUCTURE

3.1 Integrating the Airport planning system

All state and territory jurisdictions have expressed concern about the unfettered development capacity of major airports outside the scrutiny of jurisdictional planning and environmental regimes. The states and territories have pointed to the significant impact new airport non-aviation developments (such as office and retail) are having on metropolitan planning processes and on local communities that have to meet the infrastructure costs associated with off-site work necessary to support airport expansion.

States and territories also have identified the regulatory advantage gained by the airports (*vis-à-vis* businesses that are subject to jurisdictional planning controls), which appears inconsistent with national competition policy.

The current issues that arise in integrating the ACT's unique division of planning responsibilities between the Australian and Territory Governments have been examined in four inquiries within the past five years by the Federal Parliament's Joint Standing Committee on the National Capital and External Territories. Work is still underway elsewhere in which the Australian and ACT Governments are examining ways to improve that planning process.

Many of the issues, relating to the uncertainties arising from overlapping responsibilities, might be said to apply to planning for the Airport. The evidence placed before the Standing Committee, the reports presented to Parliament, the response of various Australian Governments, and the work still underway obviate the need to rehearse the arguments again in this submission. Nevertheless, those issues of making a divided planning system work provide context for the views of the ACT Government presented in this submission.

The ACT Government, as with other jurisdictions, will continue to advocate for regulatory reform concerning airport planning. The Commonwealth Green Paper acknowledges this call, and identifies the need to develop co-operative arrangements with the States/ Territories and local government to better integrate airport planning with local planning policies. The Green Paper also acknowledges the need for closer scrutiny of non-aviation development.

An ongoing issue is the lack of specific detail within the Master Plan about future proposals at the Airport. Appropriately detailed information on current and future airport operations is essential to successful cooperation between the Airport and Territory and Australian Governments in finding solutions to these planning challenges. A significant problem faced by the ACT Government and the community is uncertainty about where, when and how to obtain information about the scale and timing of non-aviation developments at the Airport where that information is missing from the Airport's Master Plan. Sufficient detail on land uses and quantum of floorspace proposed is needed to

enable the ACT Government to understand the Airport's non-aviation proposals and to consider these within its planning and infrastructure programming processes. However, information should be provided in a transparent manner, and made available to the entire community. In meetings over recent months, Airport representatives have undertaken to provide further detailed information on proposed developments at the airport, to assist ACT Government planning processes. However, it is difficult for Government to use such information when it is possible that the infrastructure, traffic or other studies that source it, may eventually be released to the general public. Therefore, it is appropriate that information that would have been provided to the ACT Government, be disclosed in the publicly accessible Master Plan document.

The 2009 Draft Master Plan fails to provide the level of detail and consistency with the ACT planning regime as required by the *Airports Regulations 1997(Commonwealth)*. In particular clause 5.02 (2) requires that where possible, proposals for land use and related planning, zoning or development to be described in an amount of detail equivalent to that required by legislation in force in the state or territory in which the airport is located. This includes using terminology and definitions consistent with that State or Territory legislation.

Although the 2009 Master Plan is an improvement on the 2008 version, there remains a need for further detail on land uses and infrastructure demands and costs. Chapter 10 of the Draft Master Plan outlines the development intended for each precinct. It includes maps for each precinct, outlining the approved developments, developments expected in five years time, and developments expected in 20 years time. However, the plans do not clearly identify the current and future intended uses within each area (rather, land uses are presented in generic lists which are the same for each precinct) or other details such as the size of building envelopes and the amount of car parking. Within these lists, certain categories of use e.g.: '*Facilities to the public, tenants and staff*' permit a wide view of what is appropriate for the needs of such users. For example, a business park is proposed in the southern half of the Pialligo Precinct (page 121), however there are no details as to its exact location and size.

An overall airport site plan showing current and future intended uses across the whole site (including freight operations as per Figure 6.4) would be of more assistance than the current Figure 10.1, which shows only current buildings and those under construction. Along with land uses, an overall plan would show areas of landscaping, parking, roads and other activities as would be the case for any other Master Plan for a significant area of development under State/Territory and local regulations. Individual plans for each precinct should then accompany this overall site plan, providing further details of building envelope, size (m²), numbers of parking spaces, access/ egress, detailed landscaping, proposed signage, infrastructure and the like.

In the area of infrastructure needs, the Master Plan does not provide sufficient details of the off-Airport road network improvements necessitated by long term

Airport growth, nor how the Airport proposes to contribute to the cost of such infrastructure. This is addressed in section 3.3 below.

3.2 Employment at the Airport: impact on planning for Canberra's town centres

The ACT Government continues to face significant challenges in adjusting its plans to accommodate the growth in non-aviation uses of the Airport's land bank.

The ACT Government continues to hold concerns about non-aviation development, including the form it takes, the impacts on centres, and the transport consequences (what transport is required, when, and who pays?). In particular, as noted in the ACT Government's response to the 2008 Master Plan, there is considerable concern that development outlined in the Draft Master Plan could challenge the role of Civic and the town centres in Canberra's commercial and retail hierarchy.

Whilst it is desirable to allow full and proper use of airport land, this land should be developed in an orderly manner, taking into account the regional context and infrastructure implications.

The ACT's *Spatial Plan*, *Economic White Paper*, and updated economic development policy, *Capital Development – Towards our Second Century*, all identify the Airport as a critical piece of infrastructure for the Canberra region as well as an important employment node within the Territory itself.

However, the *Spatial Plan* states that Civic and the town centres will be the primary focus for future employment growth. The town centres provide a focus for the surrounding residential population and are well served by public transport, appropriate community infrastructure and the arterial road network. On the contrary, uncontrolled growth at the airport has the potential to lead to increased travel and associated greenhouse gas emissions as a result of longer more car dependant trips, compared to development at Civic and the town centres. Furthermore, the list of planned uses of Airport land goes beyond the essentially industrial, broadacre and transport-related uses envisaged for the eastern area of the ACT in the *Spatial Plan*.

The 2009 Preliminary Draft Master Plan states that it is expected that up to 25,000 people will be directly employed at Canberra International Airport by 2029/30, a three-fold expansion on the current 8,000. The potential employment impacts of the proposed freight hub are discussed in section 4.3 of this submission.

One of the deficiencies in the Draft Master Plan is the absence of an analysis of how many of these jobs might be relocated from elsewhere in the ACT and how many might be 'new and additional' contributions to the ACT labour force. Nevertheless, 25,000 workers would make the Airport the second largest employment area in the ACT, on par with current employment at Civic. This would seriously distort the pattern of spatial planning in the ACT.

Planning for accommodating this scale of impact requires detailed information and extensive consultation with the ACT Government and other stakeholders.

3.3 Road and other infrastructure planning

The future multiple roles of the airport (refer section 2.1) requires appropriate planning and investment to improve the surrounding road network and other required infrastructure. Traffic movements associated with greatly increased use of the Airport, including as an employment centre (see section 4.3), would put pressure on existing roads and likely hasten the need for the duplication of Pialligo Avenue to Glenora Drive (the Airport's entrance to its north-eastern and south-eastern precincts).

The proposed northern access road from Majura Road to the Airport's north-east precinct would also advance the need to upgrade Majura Road. It would require a major new intersection, able to handle large transport vehicles and pavements capable of meeting heavy axle loadings, long before the Territory investigates a potential east-west link to Kowen in this area.

Close liaison is needed between the airport and relevant Territory bodies to identify the full cost of such road works and related infrastructure. Where it can be demonstrated that the Airport's growth is the principal factor leading to the need for off-site infrastructure works, there is a strong case for the Airport contributing to the overall costs. The ACT Government notes the Airport's willingness to financially contribute to the current work on Pialligo Avenue, and considers this is a possible precedent for the future.

The 2009 Preliminary Draft Master Plan provides further detail than the 2008 Draft Master Plan on the proposed northern road, connecting Fairbairn with Majura Road. This proposed road needs to integrate with both the Majura Parkway proposal, and the potential long term east-west road to Kowen.

The Master Plan also should acknowledge the presence of the new Emergency Services Agency head quarters in the precinct and the need to ensure good access and egress for Emergency Services Agency traffic in times of emergency.

The current ACT Government position is that the planning and current EIS for Majura Parkway have not included the Northern Distributor road because adequate planning for a future Kowen has not taken place.

The design of the Parkway will not preclude a major intersection some distance north of the Fairbairn Interchange and the alignment is such that it could be located in a range of locations over a 2.5km section. There are environmental and land ownership issues that may ultimately determine the location of any future road connection to Kowen.

Access for ESA at Fairbairn can be maintained via the existing Majura Road which will be more of a service road with the construction of the Parkway.

The proposed northern road offers the potential for improved access and opportunities for upgraded telecommunications infrastructure for the ACT's Emergency Services Agency.

The Draft Master Plan outlines the planned road upgrades within and around the Airport, including investigations and projects being funded by the Australian and ACT Governments. However, it does not provide sufficient analysis of the off-Airport road network improvements necessitated by the future growth of the Airport as envisaged in the Draft Master Plan, nor does it address the financial issues identified in section 2.2. Furthermore, there appears to be little acknowledgement of the potential traffic impacts of growth in residential development in adjoining areas of NSW.

The Draft Master Plan contains references to other transport modes, particularly the Very High Speed Train and a regional bus network, without providing sufficient strategic commitment and/or development details to enable the ACT Government to incorporate such ideas into its own planning processes.

Infrastructure master plan

The extent of the Airport's expansion plans, the current road and traffic issues in the Airport area and the impact on ACT budgetary resources, necessitate careful planning of new construction activity to minimise public inconvenience. The ACT Government believes the Airport should prepare an infrastructure master plan for the Airport containing associated funding arrangements, including a mechanism by which the airport contributes to the cost of upgrading and maintaining infrastructure associated with its growth (see section 2.2). Such a plan would assist with sequencing major infrastructure and with budgeting for public and private expenditure. It would itemise, prioritise and cost the off-airport road infrastructure associated with proposals, and indicate a proposed contribution to such.

The Aviation Policy Green Paper (page 168) indicates the Commonwealth's acknowledgement of the need to investigate further the issue of airport contributions to surrounding road infrastructure. The ACT Government has supported this in its submission on the Commonwealth's Aviation Green Paper.

3.4 Acquisition of Commonwealth land

The lack of strategic decisions and implementation details about land acquisition in the Draft Master Plan provides another source of difficulty for ACT planning.

The acquisition of Commonwealth land identified as surplus to requirements was previously raised in the ACT Government's submission on the 2008 Draft Master Plan. The ACT Government has advised the Australian Government of its preference for being given first right of refusal for any Commonwealth land in the Territory that is identified for disposal. The Territory continues to hold this view in light of some of the proposals included in the Draft Master Plan.

For example, the Draft Master Plan states that the development at Fairbairn will be gradual and incremental, in response to user demand. It also indicates the Airport's interest in future land purchases from the Commonwealth (Defence) to the north, east and north-east. This includes Fairbairn Golf Course (p 125), if disposed of by the Commonwealth.

The ACT Government acknowledges that it may be necessary for the Airport to acquire further Defence land adjacent to the Airport if it is to achieve the longer-term outcomes of the Master Plan. This includes planning for the possibility, in the long-term, of a future, wide-spaced parallel north-south runway to the east of Fairbairn, to be operated to avoid overflight of Queanbeyan residential areas. The ACT Government advocates that should any land be transferred to the airport under such circumstances, that the planning responsibility for such land rest with the Territory, and be subject to its planning regime.

The ACT Government would be concerned if further land acquisition in the North East precinct and the new northern access road were to facilitate further non-aviation related development which adversely impacts on the ACT's existing commercial centres hierarchy.

3.5 Restriction of on-Airport land uses

The ACT Government supports proposals in the Aviation Policy Green Paper 2008 for the prohibition on airport land of land uses such as residential, aged care, community care and public child care facilities, hospitals and schools that are incompatible with the operation of an airport (other than those designed principally for staff working on the airport).

The ACT Government supports the development of clear regulations for safeguarding airports from off-airport developments that have the potential to affect the safe operation of airports. Regulations would address such matters as airspace protection (building height), materials and land uses around airports.

4 THE FREIGHT HUB: MANAGING TRAFFIC, AIRCRAFT NOISE AND OTHER COMMUNITY IMPACTS

4.1 The freight hub

The Draft Master Plan highlights the economic benefits for the region from a freight hub, and attempts to address concerns raised by the community in respect to aircraft noise and additional road traffic. The Draft Master Plan (page 67) notes that curfew restrictions at Sydney Airport are expected to deliver substantial new opportunities for air freight at Canberra International Airport.

Canberra's role in the freight network is also acknowledged by the Australian Government in its 2008 Aviation Policy Green Paper. The Green Paper identifies the importance of maintaining a network of curfew-free airports, including Canberra International Airport on north-south and east-west axes, to allow for the ongoing successful operation of overnight airfreight. It also states that airports must develop appropriate arrangements to minimise the noise impacts of night time operations.

Nevertheless, the ACT Government is concerned that the Draft Master Plan still lacks sufficient detail about the design and operation of the freight hub to anticipate how to plan for managing the traffic, aircraft noise and/or other impacts on the ACT community. The Draft Master Plan provides for little more than an 'in principle' response to the concept of a freight hub. The detail provided is unlikely to allay community concerns about the lack of specific detail about the scale of the freight hub and the potential impacts on their residential amenity.

4.2 Traffic Impacts

It would appear from the limited information available that increases in truck movements associated with the freight hub are limited and that trucks would use designated heavy vehicle routes located away from residential areas. These routes already accommodate large volumes of heavy vehicles (eg: 1,700 per day on Majura Road and Pialligo Avenues).

While there would be additional commercial and industrial development at the Airport, on account of the airfreight operations, the limited information available in the Draft Master Plan (Chapter 11) indicates that the current and future proposed upgrades to the regional road network are expected to meet demands of users for the planning period of the Master Plan.

4.3 Employment and land use impacts

The Draft Master Plan envisages that a freight hub would increase demand for warehousing, freight-forwarding and similar facilities in the vicinity of the Airport and suggests that additional land outside of Fyshwick and Hume will be required, noting the opportunities afforded by the Majura Valley and Queanbeyan (South Jerrabomberra). The Airport is a key consideration in the

ACT Planning and Land Authority's Eastern Broadacre Planning Study (the Study). The Airport will be consulted at key stages in the implementation of the Study to ensure that all relevant opportunities and constraints associated with Airport growth are identified. However, the Draft Master Plan provides only a vague connection between planning for growth at the Airport and growth in the surrounding ACT and Queanbeyan region.

Figure 6.4 of the Draft Master Plan identifies an area in the Majura Valley (off-Airport) as "current and future ACT and region freight distribution". However, part of this area includes Defence Land that the Territory has no jurisdiction over, and so would not be seeking to develop. Furthermore, whilst the potential of the Majura Valley is being generally explored as part of the Eastern Broadacre investigations, no decisions have been made concerning the future uses or potential development areas. Accordingly, the reference should be deleted from the map (particularly where it occurs on Defence Land) or it should be clarified as "possible future industrial (including freight distribution) uses".

4.4 Aircraft noise impacts

The Draft Master Plan anticipates that freight aircraft operations would increase from the current five aircraft per night, to approximately nine in five years' time, which could include larger aircraft than currently operate at night. In 20 years, it is expected that up to 25 aircraft per night may operate as part of a freight hub. The Master Plan indicates that noise is expected to be generally contained within the existing High Noise Corridor, avoiding the residential areas of the ACT and Queanbeyan (apart from some homes in Jerrabomberra located in the High Noise Corridor) but extends north and south of the High Noise Corridor over predominantly rural areas.

The Draft Master Plan contains a commitment to prohibiting aircraft overflight of the Noise Abatement Areas at night (between 11pm and 6am), except where operationally required. This requirement would apply to both existing and all future freight operators.

The proposal to increase night-time operations has generated significant public debate and vocal opposition from organisations such as Curfew 4 Canberra. These debates are characterised by diverging views on the most appropriate indicators of noise and on how best to interpret these indicators, which reflects discussion in the Aviation Policy Green Paper about the confusing nature of technically complex information about (aircraft) noise. It is almost inevitable that such confusion will be evident in responses to the Plan's discussion of noise information and management. Hence, we anticipate expressions of enduring concern about the adequacy of public consultation on this aspect of the revised Draft Master Plan.

The Draft Master Plan would be improved by the more judicious use of terms such as 'meaningful' and 'critical' when presenting information about aircraft noise measurements. In addition, the Draft Master Plan's use of the 65dB contour has the disadvantage of being an indicator of a single noise event without any reference to frequency or distribution of noise events, nor indicating how far above 65dB a single event might be. Also, the 65dB takes

no account of the contribution of time of day, weather conditions or surrounding topography to the subjective 'noise experience'. In this sense, the Plan does not address known community concerns.

There is some research supporting the superiority of equal energy indicators, such as ANEF, as predictors of a person's reaction to a noise event. Furthermore, the ACT Government submission in response to the Aviation Policy Green Paper noted the potential benefits for community understanding of the effects of aircraft noise of publishing N70 diagrams in addition to ANEFs. The same comment is made in regard to the material in this Draft Master Plan.

Figures 14.7 and 14.9 (Arrival, Departure and Circuit tracks under the Ultimate Practical Capacity ANEF) are difficult to interpret, especially in relation to Figure 14.13 which shows a much streamlined endorsed Ultimate Practical Capacity ANEF. Both figures should be explained in greater detail or relocated to an appendix.

4.4.1 Residential development under flight paths

The Draft Master Plan addresses airport noise and the decisions of the NSW Government and Queanbeyan City Council in approving residential at South Jerrabomberra. The ACT Government has maintained its opposition to South Jerrabomberra due to the potential impacts of residential development on the current and future operations of Canberra International Airport, and the potential for land use conflict with the existing Hume industrial area.

The ACT Government's long held position in relation to limiting future residential development under the Airport flight paths is well-established, as evidenced by its public objection to potential residential development at Tralee, Environa and the Poplars. Such development would likely lead to strong complaints about aircraft noise from the new residents, which could cause adjustment to the flight paths in ways that could cause noise-sharing over Canberra and Queanbeyan. This would be a wholly undesirable outcome and is not supported.

The Draft Master Plan states that "*Canberra Airport supports the extension of the Noise Abatement Areas to cover residential development in eastern Gungahlin and future residential development at Googong*" (page 177) and envisages that this will be achieved by 2010. The ACT Government supports this action. However, it is understood that the Federal Minister, the Hon Anthony Albanese MP advised in December 2008 that the Australian Government has no plans to change the existing Noise Abatement Area in Canberra at this time. The Master Plan should be amended to reflect the Australian Government's position so that expectations are not raised regarding an extension of the Noise Abatement Area.

5 COORDINATED MANAGEMENT OF CONSERVATION AND ENVIRONMENTAL VALUES

5.1 Conservation of native grassland and threatened species

The ACT Government acknowledges that the Draft Master Plan has been revised to include additional material on environmental management issues, particularly the protection of important native grassland and the habitat it provides for threatened species such as the Grassland Earless Dragon. However, some important concerns remain, particularly connectivity of the grasslands on Airport land with neighbouring land and the loss of 22 ha of endangered grasslands as a result of proposed Airport development.

Less than 1% of Australia's pre-1750 natural temperate grasslands survive and the ACT now has only 5% of its original grasslands remaining. Natural Temperate Grasslands and many of its component species are listed as endangered under the *Environment Protection and Biodiversity Conservation (EPBC) Act 1999* (Commonwealth). The patch of grassland at the Airport provides important habitat for several threatened plant and animal species and is of particular importance for the endangered Grassland Earless Dragon that inhabits the grasslands, both at the Airport and the adjacent Defence land. This population of dragons is one of two populations left in the ACT.

The Draft Master Plan refers to the 'Airport Environment Strategy', the 'Grasslands Management Plan' and the 'Threatened Species Strategy'. However, the 'Threatened Species Strategy' is currently not available for public comment and the ACT Government has previously raised concerns during public consultation periods about the lack of protection afforded to threatened species and communities under the Environment Strategy and the Grasslands Management Plan. These documents do not yet appear to provide sufficient protection for the grasslands on Airport land. Of particular concern is the impact of the northern access road on endangered grassland and habitat for the grassland earless dragon.

The Draft Master Plan would be improved with a more thorough discussion of how it is intended to address the impacts of development on the Airport's grassland, and its component threatened species. It would also benefit from the inclusion of firm statements of commitment to the environment and biodiversity conservation by addressing the impacts of development.

Should development proceed as suggested, the proposed Conservation area to the north of the runway is insufficient to offset the loss of native grassland. The Draft Master Plan should specify how conservation objectives of the EPBC Act and the ACT Government could be met by, for example, the use of offsets as follows:

- restoration of native grasslands elsewhere in the ACT to a condition where they are suitable for Grassland Earless Dragon;

- support the captive breeding program to enable reintroduction of the Grassland Earless Dragon to the above restored areas; and
- support the ACT wide annual surveys of Grassland Earless Dragon.

On 12 March 2009 the ACT Commissioner for Sustainability and the Environment released a Report “*ACT Lowland Native Grassland Investigation*”. The report addresses the deterioration of Lowland Native Grassland in the ACT. It includes the important areas of grassland on the Airport site and makes a number of recommendations concerning these areas. Accordingly, the Airport should consider and respond to the findings of the Commissioner’s Report in the final Master Plan.

5.2 Groundwater use

The Draft Master Plan lacks adequate detail for the Territory’s agencies and/or communities to consider and comment on the Airport’s use of groundwater. The revisions to the Draft Master Plan do not address the potential problems arising from the use of additional bores for non-potable water.

The Airport area is near the sustainable limit of what can be taken from groundwater. Were there to be unlimited bores, then the use of groundwater might become unsustainable, as well as possibly creating large cones of depression from the Airport site that would hydraulically draw groundwater away from nearby areas like Pialligo, thus impacting on existing licensed users.

6 DETAILED COMMENTS

6.1 Aviation uses of the Airport

The ACT Government appreciates that the proposed international services will require the Airport to be fully designated as an unrestricted international airport with full Australian Government funding of customs, immigration and quarantine services. The ACT Government supports a proposal by the Canberra International Airport to the Australian Government to make this designation.

The ACT Government response to the Aviation Policy Green Paper raised concern that the privatisation of major airports was having a significant impact on General Aviation as airports endeavour to maximise financial returns through more lucrative uses. The Draft Master Plan foreshadows the relocation of General Aviation within the Airport lands, however commits to '*maintaining a vibrant General Aviation sector*' (page 86). It also commits to continued military aviation, and to '*actively supporting any increase in military aviation at the Airport*' (page 88).

6.2 Signage and advertising

Whilst signage is necessary for the Airport's operation (for example, the business signage identified in Section 10.5.1), the ACT Government has some concerns about the nature of advertising foreshadowed in the Draft Master Plan. Section 10.5.2 indicates an intention to develop commercial advertising (billboards and other advertising signage and concepts) facing into and out of the Airport: '*Advertising billboards and other advertising signage and concepts visible from internal and external roadways and the Airport will incorporate a wide range of designs to maximise the visual impacts of the billboards*'.

The ACT Government would prefer that the Draft Master Plan respect the minimal impact that advertising structures and signs currently have in the nation's capital city, including along major approach routes. This has managed to avoid the visual intrusion associated with such signs in other Australian cities. It is generally appropriate that third party signage ('advertising' as indicated in Section 10.5.1) be avoided, or limited, in order to minimise visual impacts.

6.3 Inaccurate references to documents

The Draft Master Plan contains several references to the ACT Government's *Economic White Paper* (2003). However, the Government has since released an updated economic development policy, *Capital Development – Towards our Second Century*. The Draft Master Plan would be improved by using references to this document rather than relying on the *Economic White Paper*.

The Draft Master Plan includes references to *The Canberra Spatial Plan*, although not all citations are correct. For example, there are several references to the location of a Canberra terminus for the Very High Speed Train (VHST) at or near the Airport, including those on pages 16, 111 and 150. Whilst the

Airport may prove to be a suitable location, the *Spatial Plan* currently shows only the route of the VHST (which touches the western edge of the Airport), not the proposed terminus or stops. The Draft Master Plan should be amended so that it does not attribute to the *Spatial Plan* the identification of a particular location for the terminus.

6.4 Maps etc

In addition to deficiencies in detail concerning land uses and other activities at the airport (see section 3.1 above), the following shortcomings have been identified.

- a) Figures 13.1 and 13.2 are not easily comprehended and require both a legend and explanatory notes;
- b) The resolution of some maps and diagrams (eg Figure 14.4) is unclear, making them hard to read;
- c) Table 6.3 should indicate that the figures provided are 'per night';
- d) The graphs on page 55 require units of measurement for both X and Y axes; and
- e) all maps in the Master Plan should recognise the future urban areas of Gungahlin (including Throsby and Kenny) which can be viewed at www.actmapi.act.gov.au

7 CONCLUSIONS

The ACT Government supports the continuing development of the Airport. However, the current Draft Master Plan has significant deficiencies as a document useful for guiding the ACT Government's planning for, and community understanding of, the Airport's development throughout the planning period.

Some of these difficulties may be attributed to the unique challenges of integrating both Airport and ACT planning regimes, shared as each is between the Australian and Territory Governments. Several references to the National Aviation Green Paper have been made in this submission. There is an expectation that the Aviation White Paper, to be released later in 2009, will address concerns about planning processes shared by all state and territory jurisdictions.

However, many other difficulties appear attributable to the absence from the Draft Master Plan of information identifying the planning implications of the strategic choices that have been made for guiding the Airport's development over the next twenty years. Most particularly, the Government is concerned about the limited detail about certain strategic developments at the Airport which will impose obligations on the ACT to adjust its own planning to accommodate the growth of the Airport. Non-aviation development, including the form it takes, the impact on existing centres in Canberra, the transport consequences and costs to the Territory of upgrading the surrounding road network, remains an ongoing concern. The ACT Government will continue to advocate for regulatory reform regarding non-aviation development and other aspects of airport planning, as outlined in a submission to the Commonwealth's Aviation Green Paper earlier this year.