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Project Manager
Cairns Airport Land Use Plan Submissions
Cairns Airport Pty Ltd
PO Box 57, Airport Administration Centre
CAIRNS AIRPORT QLD 4870

Dear Sir or Madam

Submission by AAG-C

Thank you for allowing the AUSTRALASIAN AVIATION GROUP – CAIRNS INC. ("AAG-C") to submit a late response to the draft Land Use Plan 2010 ("draft LUP").

The AAG-C represents more than 26 aviation companies and businesses in the Cairns area and is an advocate for continuing interest, investment and longevity in Tropical North Queensland's aviation industry.

To help prepare our response, aviation businesses based on the western side of Cairns Airport in the General Aviation precinct were recently surveyed about the draft LUP. The survey asked for both positive and negative impacts of the draft LUP firstly on their own businesses, and secondly on the greater Cairns economy. A significant number of written responses to the survey were received and collated. A summary of the responses is attached which shows that the negative impacts outweigh the positives, and the positives were guarded in their support.

The AAG-C also received additional feedback from members during the consultation period which has been incorporated into our submission.

Please accept this formal response from the AAG-C and we look forward to further consultation with Cairns Airport Pty Ltd as this matter progresses.

Yours faithfully

Murray Ireland
Chairman
AUSTRALASIAN AVIATION GROUP – CAIRNS INC.



**Submission to
Cairns Airport Pty Ltd**

To address a draft Land Use Plan (LUP)
published on 15 December 2010

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ACRONYMS AND ABBREVIATIONS USED

Abbreviation	Explanation
AAG-C	Australasian Aviation Group – Cairns Inc.
ATSB	Australian Transport Safety Bureau
BITRE	Bureau of Infrastructure, Transport and Regional Economics
CAPL	Cairns Airport Pty Ltd
CASA	Civil Aviation Safety Authority
CEO	Chief Executive Officer
FNQ	Far North Queensland
GA	General Aviation
LUP	Land Use Plan
OLS	Obstacle Limitation Surface
PNG	Papua New Guinea
RPT	Regular Public Transport

The AAG-C – Who we are

The *Australasian Aviation Group – Cairns Inc.* (AAG-C) was established in 2006 with support from the Queensland Government and key aviation industry businesses in Cairns.

- The AAG-C is a not-for-profit association that showcases aviation and related businesses to the local, domestic and Australasian regions as valued and integral members of the Cairns aviation community.
- The common business interests of AAG-C members represent both a diversified and a united voice to government organisations, aviation infrastructure providers, and the general community.
- The AAG-C uses membership funds to advocate for ongoing interest, investment and longevity in Tropical North Queensland's aviation industry. It does this in several ways including print and internet-based promotions as well as through its "Aviation Cairns" website aviationcairns.com.au.
- The AAG-C is a single point of contact (a one-stop-shop) for anyone locally, interstate or overseas with an aviation interest in the Cairns area – whether they be tourists or support businesses, company project coordinators or office managers, aircraft owners or operators, pilots or passengers, maintenance managers or personnel – seeking to use the area's many aviation services on a one-off or recurring basis.

A list of financial members of the AAG-C is published in bold type on its website at <http://www.aviationcairns.com.au/bizlist>.

AAG-C's consultative approach

To help the AAG-C prepare this formal submission to CAPL, aviation businesses currently based on the western side of Cairns Airport (in the General Aviation precinct) were recently surveyed about the draft LUP. The survey asked for both positive and negative impacts of the draft LUP firstly on their own businesses, and secondly on the greater Cairns economy.

A significant number of written responses to the survey were received and collated, all of which have been summarised below and overleaf.

1. The **positive survey comments received** about the draft LUP were able to be categorised under one or more of the following headings:

- Safety improvement — e.g. obstacle clearances will be internationally compliant
- Employment benefits — e.g. more work for contractors and builders
- Future leases in new mixed aviation use area — e.g. could be long-term opportunities that will help existing businesses decide whether to stay or move business and aircraft away from Cairns
- Communication style of CAPL — e.g. a positive and conciliatory approach by CAPL will enhance everyone's prosperity
- New mixed aviation use area on eastern side of runway — e.g. hopeful of new facilities; more aircraft parking; better GA terminal.

It should be noted that respondents were sceptical of CAPL's intention to provide these improvements due to the recent adversarial communication style of some CAPL staff.

AAG-C's consultative approach continued

2. The **negative survey comments received** about the draft LUP were able to be categorised under one or more of the following headings:

- Uncertainty due to existing lease conditions — e.g. short-term only with 90-day termination clauses making bank finance and planning difficult; no parity with comparable commercial rents; stifling of growth and investment; potential loss of jobs; less potential tenants in the new Mixed Aviation Zone
- Current adversarial communication style of some CAPL staff — e.g. unwilling to renegotiate current leases; rejecting new applications; lack of written communication; lack of trust and breakdown of commercial relationship
- Concerns over transitioning to eastern side of runway — e.g. business disruption; time; costs; lost exposure to highway frontage; flow-on effect of increased costs
- Concerns over the new mixed aviation use area on eastern side of runway — e.g. unknown leasing and/or building costs; unspecified facilities to be available; uncertain if room for expansion; additional travel time, costs and road congestion to be incurred by all
- Concerns over the proposed new retail/commercial development on the western side of the runway — security of non-aviation people against perimeter fence; safety of clusters of non-aviation people adjacent to perimeter fence if aircraft accident compromises boundary; questioning appropriate use of the land; economic impact on the greater Cairns community including retail/commercial centre owners north and south of the airport; why does Cairns need another shopping centre.

3. In addition, **members have provided feedback** to the AAG-C Committee in relation to the draft LUP throughout the consultation period. The issues highlighted by members that are unquantified in the draft LUP include:

- The importance of General & Regional Aviation to the region's economy — e.g. non-alignment of LUP with Governments' strategic plans that include GA growth/training/facilitation
- The interest and recognition of General & Regional Aviation's capabilities, particularly internationally — e.g. CAPL has delayed expansion of on-airport accredited training into composite materials
- The potential for growth in the General & Regional Aviation industry — e.g. how will CAPL's Plan encourage GA participation in the mining sector in PNG and regional Australia
- Disruption to General & Regional Aviation businesses consequential to the publication of the draft LUP — e.g. smothering by CAPL of any expansion by existing businesses which has affected their willingness to reinvest; existing synergies between aviation businesses mean if one closes others will follow
- Security, safety, and 24 hour airport operations — e.g. non-aviation people *en masse* along the western side of the runway requiring public safety areas and greater opportunity for the non-aviation community to mount a successful noise curfew campaign.

AAG-C's information sources

The information in this submission has been based on:

- the recent survey of aviation businesses mentioned above
- feedback provided by AAG-C members during the public consultation period, and
- the AAG-C Committee's evaluation of the draft LUP.

The AAG-C also referred to the Federal Government's National Aviation Policy White Paper (published in December 2009) and in particular its statements regarding General Aviation and Airport Management.

Elements of the draft LUP with which the AAG-C agrees

The AAG-C agrees with the following statements in the draft LUP. The references to pages and sections in the table below are not a comprehensive index – the subject matter may also occur elsewhere in the draft LUP.

Element		Document ref
1	Our mission for our company & people is to be respected members of our community ... and contribute to the economic growth of our stakeholders	Page 2, Our Mission
2A	Respond to continued demand for Airport facilities, including passenger, freight and business/commercial activities	Page 2, Strategic Vision
2B	Respond to the useability requirements of passengers and other users of the airport	Page 2, Strategic Vision
2C	Maximise the use of available airport land and provide for flexibility in future expansion	Page 2, Strategic Vision
2D	Encourage the development of mixed business, retail and light industrial areas in appropriate locations	Page 2, Strategic Vision
2E	Incorporate best-practice management into airport planning, development, maintenance and operation	Page 2, Strategic Vision
3A	Cairns Airport is integral to Tropical North Queensland's prosperity. On its completion the Land Use Plan will become the single most important planning document to take Cairns Airport, our city and our region, into the future	Page 4, Foreword
3B	The airport has a broad range of stakeholders including airlines, airport tenants and associated businesses, all levels of government, those involved in tourism, mining, service, agriculture and fishing industries as well as members of the local community	Page 4, Foreword
4	Airport land use planning deals with a limited range of land uses, primarily focused on aviation, transport and infrastructure related development having regard to synergies that come from co-location of uses, proximity to movement areas, airside/secure access and ground transport access	Page 10, 1.11 Background & new requirements
5A	Aviation will remain the planning focus for development on airport	Page 16, Strategic Outcomes
5B	Land use provisions should: ... iii) Provide adequate area for inactive aircraft parking positions; iv) Provide adequate area for aircraft maintenance facilities including hangars and workshops; v) Promote and accommodate aviation related administrative and commercial facilities including flight training, car parking, maintenance and servicing areas; vi) Promote the development of additional movement, secured and airside access areas.	Page 16, Strategic Outcomes
5C	A more effective approach to reducing the consequences associated with disasters ... and hazards (such as ... aircraft emergencies and fire) is considered through appropriate design, development and management of different land uses on airport	Page 16, Strategic Outcomes
6	Airport viability is considered in two parts: •Statutory land use planning — aircraft and passenger operations and facilitations; and •Non-statutory — aviation business promotion	Page 21, Strategic Outcomes
7	The economic bottom line should not dominate decisions on airport	Page 22, section L04.1
8	The mixed aviation land uses (including general, regional and others) allow for numerous core activities that require airside access (i.e. where the activity deals directly with aircraft, and is inside the security perimeter). These include operation of air charters utilising both fixed and rotary wing (helicopter) aircraft, fly-in-fly-out operations, reef charters and tours, military applications, aircraft maintenance, and support facilities such as catering and provisioning, fuel, emergency services, flight and other aviation-related training etc. The requirements for these activities contribute to the overall regional economic performance	Page 148, Mixed Aviation Land Use

Elements of the draft LUP with which the AAG-C disagrees

Most of the AAG-C's disagreements with the draft LUP are in relation to omissions. The references to pages and sections in the tables below and overleaf are not a comprehensive index – the subject matter may also occur elsewhere in the draft LUP.

1. Definitions

Element	Document ref
<p>1A LACK OF FORMAL DEFINITION – Stakeholders</p> <p><i>Comment by AAG-C:</i> Although mentioned several times in the draft LUP, <i>stakeholders</i> is not a defined term in the document.</p> <p>There is mention of stakeholders in the CEO's Foreword letter (on page 4) in which he describes them as "including airlines, airport tenants and associated businesses, all levels of government, those involved in tourism, mining, service, agriculture and fishing industries as well as members of the local community."</p> <p><i>Stakeholders</i> is a key term and should be a formalised definition, not a mention in an introductory letter.</p> <p>Recommendation by AAG-C: That the final Land Use Plan formally defines the term <i>stakeholders</i> and detail who they are.</p>	<p>Page 2 – Strategic Vision</p> <p>Page 4 – Foreword</p>

Element	Document ref
<p>1B LACK OF FORMAL IDENTIFICATION – Core Airport Infrastructure</p> <p><i>Comment by AAG-C:</i> The AAG-C has a concern regarding Cairns Airport's Core Airport Infrastructure as listed in Schedule 1 of the draft LUP. General & Regional Aviation should be specifically identified as a part of Cairns Airport's Core Airport Infrastructure. In addition, the AAG-C strongly disagrees with the proposed provision of certain non-core infrastructure which requires the relocation of the entire General Aviation precinct from the western side of Cairns Airport.</p> <p>Recommendation by AAG-C: That the final Land Use Plan formally identifies General & Regional Aviation infrastructure in the definition of Cairns Airport's core airport infrastructure.</p>	<p>Page 128 – Schedule 1</p>

Element	Document ref
<p>1C LACK OF FORMAL DEFINITION – General & Regional Aviation</p> <p><i>Comment by AAG-C:</i> Throughout the draft LUP, there are multiple incorrect references to "recreational aviation" whereas the appropriate language should be General & Regional Aviation. The Plan therefore reflects a lack of understanding of the true nature of aviation activities on the western (General Aviation precinct) side of Cairns Airport in the so-called Mixed Aviation Zone.</p> <p>The GA precinct currently provides a mix of scheduled and non-scheduled (passenger and freight) air transport services and aerial work flights, as well as housing an accredited industry training centre and a significant number of supporting maintenance/repair/overhaul businesses. To a much lesser extent, private/business and recreational aircraft also undertake flights from the GA area.</p> <p>The description of Mixed Aviation Land Uses on page 148 is the only terminology in the draft LUP that comes close to being appropriate: "[Mixed Aviation Land Uses] include operation of air charters utilising both fixed and rotary wing (helicopter) aircraft, fly-in fly-out operations, reef charters and tours, military applications, aircraft maintenance, and support facilities such as catering and provisioning, fuel, emergency services, flight and other aviation-related training etc."</p> <p>Recommendation by AAG-C: That the final Land Use Plan formally defines the term <i>General & Regional Aviation</i> in accordance with currently accepted Government definitions – see the next page for examples*.</p>	<p>Page 2 – Strategic Vision</p> <p>Page 16 – 5)</p> <p>Page 17 – E04</p> <p>Page 18 – E05</p> <p>Page 18 – S05.2</p> <p>Page 18 – L05.1</p> <p>Page 35 – O01</p> <p>Page 35 – P01.2</p>

Elements of the draft LUP with which the AAG-C disagrees

1. Definitions (1C) continued

* There are many definitions of General Aviation. Following are some examples.

Federal Government's Aviation Policy White Paper definition: General aviation performs an essential role within the broader aviation industry and in providing air services such as charter flights, aerial agriculture, aeromedical services, search and rescue, firefighting, surveying and aerial photography, pilot training, aircraft maintenance and repair work. It also includes private and recreational flying.

BITRE definition: General Aviation is defined as all non-scheduled flying activity in Australia by aircraft allocated a VH- registration by the Civil Aviation Safety Authority (CASA), except for that performed by the major domestic airlines, but including non-scheduled flying by Regional Airlines.

Department of Infrastructure & Transport definition: General Aviation commonly refers to that part of the aviation industry that engages in activity other than scheduled commercial airline activity. This may include charter operators, aeromedical operators, agricultural aviation businesses, aviation-based fire-fighting services, training and aerial work such as aerial photography and surveying. It also includes private, business, recreational and sports aviation activity and supporting businesses such as maintenance providers.

ATSB definition: General aviation is all flying activities outside of scheduled (RPT) and non-scheduled (charter) passenger and freight operations. General aviation ... does not include Australian non-VH registered aircraft. General aviation does include:

- Aerial work including ambulance and emergency medical services; agriculture, mustering, search and rescue, fire control, and survey and photography;
- Flying training;
- Private, business and sports aviation — sports aviation includes gliding, parachute operations, and acrobatics.

For completeness, the definition of "General & Regional Aviation" in the final LUP will need to include both GA and Regional Aviation components.

2. Recognition

Element	Document ref
<p>2A LACK OF RECOGNITION – Strategic Vision</p> <p><i>Comment by AAG-C:</i> The AAG-C has a concern regarding an element of the Strategic Vision. As a major stakeholder in the Cairns aviation community, General & Regional Aviation should be acknowledged as a part of Cairns Airport's Strategic Vision.</p> <p>Recommendation by AAG-C: That the Strategic Vision in the final Land Use Plan include the following commitment: "Foster and facilitate General & Regional Aviation activities"</p>	Page 2 – Strategic Vision

Element	Document ref
<p>2B LACK OF RECOGNITION – Growth projection tables for background and growth assumptions</p> <p><i>Comment by AAG-C:</i> CAPL's Mission Statement (on page 2) includes its commitment to "contribute to the economic growth of our stakeholders". The AAG-C is therefore concerned there are no growth projection tables included in Schedule 5 of the draft LUP for Mixed Aviation Land Use and the activities in the General Aviation precinct. The draft LUP lacks these important details which would demonstrate General & Regional Aviation's contribution to the economic growth of Cairns and the region.</p> <p>Recommendation by AAG-C: That the Schedule of background and growth assumptions in the final Land Use Plan include growth projection tables for each of the activities currently undertaken in the General Aviation precinct, e.g.</p> <ul style="list-style-type: none"> • regional scheduled air transport services • local and regional non-scheduled air transport services • local and regional aerial work flights • local and regional private/business and recreational flights • an accredited industry training centre of excellence, and • maintenance/overhaul/repair businesses that support all of the above. 	Page 146 – Schedule 5

Elements of the draft LUP with which the AAG-C disagrees

2. Recognition continued

Element	Document ref
<p>2C LACK OF RECOGNITION – Use of “Recreational” aviation</p> <p><i>Comment by AAG-C:</i> AAG-C takes exception to the terminology used in the draft LUP describing General & Regional Aviation as “recreational aviation”. This has the effect (deliberately or otherwise) of significantly diminishing the important role that General & Regional Aviation plays at Cairns Airport and to the region. Recreational aviation is a minimal activity at Cairns.</p> <ul style="list-style-type: none"> • The General Aviation (GA) precinct in Cairns primarily provides scheduled and unscheduled (passenger and freight) air services and aerial work flights, with the maintenance/repair/overhaul facilities to support them. • The GA precinct is also home to an accredited industry-owned aviation training centre of excellence that services Far North Queensland and the Pacific region. The facility was funded by industry and the Federal Government and has added more than 200 trained aviation apprentices to North Queensland’s workforce capability. <p>Recommendation by AAG-C: That all references to “recreational” aviation in the Land Use Plan be replaced with “General & Regional Aviation” as formally defined in Recommendation 1C.</p>	<p>Page 2 – Strategic Vision Page 16 – 5) Page 17 – E04 Page 18 – E05 Page 18 – S05.2 Page 18 – L05.1 Page 35 – O01 Page 35 – P01.2</p>

3. Justifications

Element	Document ref
<p>3A LACK OF JUSTIFICATION in draft LUP</p> <p><i>Comment by AAG-C:</i> Although the draft LUP document provides some certainty for Cairns Airport and its investors and shareholders, it has fuelled uncertainty for its General & Regional Aviation stakeholders and their families, as well as for existing retail and commercial business owners to the north and south of Cairns Airport. The AAG-C believes there will be a negative impact on the whole Cairns economy if the Land Use Plan as drafted is implemented.</p> <p>Recommendation by AAG-C: That the final Land Use Plan include:</p> <ul style="list-style-type: none"> • a detailed impact statement on the proposed relocation of the General Aviation precinct to the eastern side of the main runway, and • a detailed impact statement of the effect the Plan will have on non-airport businesses in the Cairns economy. 	<p>Entire document</p>

Element	Document ref
<p>3B INAPPROPRIATE COMMUNICATION WITH STAKEHOLDERS – Leases</p> <p><i>Comment by AAG-C:</i> On page 22 of the draft LUP, it states “CAPL continues to be a good corporate citizen”. Based on recent tenancy negotiations between GA businesses and CAPL, and the content in the draft LUP regarding relocating the GA precinct, the AAG-C disagrees with that published statement. There has been no commitment by CAPL to charge its aviation business tenants fair rents that are comparable with commercial/industrial rents elsewhere in Cairns, either now or in the future.</p> <ul style="list-style-type: none"> • Cairns Airport is unfairly using short-term lease clauses to move aviation businesses out of existing buildings and hangars. • Cairns Airport is not communicating any indication of rents, or relocation assistance, for businesses it wants to see relocated to the proposed new Mixed Aviation Zone to be built on reclaimed swamp on the eastern side of the main runway (away from the Captain Cook Highway). <p>Recommendation by AAG-C: That the final Land Use Plan include a commitment to work in partnership with stakeholders (including the AAG-C) in relation to current and future Mixed Aviation Land Use, and to amicably and professionally negotiate commercial rents comparable with equivalent commercial rents elsewhere in Cairns.</p>	<p>Page 22 – S04.1 Page 22 – E05 Page 22 – S05.1</p>

Elements of the draft LUP with which the AAG-C disagrees continued

4. Options

Element	Document ref
<p>4A LACK OF OPTIONS – Revitalisation of existing General Aviation precinct</p> <p><i>Comment by AAG-C:</i> There are no options or alternatives provided in the draft LUP. Revitalisation of the western side of Cairns Airport as a base for ongoing General & Regional Aviation has not been considered in the draft LUP. The draft LUP makes it clear that CAPL intends to revamp the existing General Aviation precinct for non-aviation commercial/retail uses because of its close proximity to potential consumers passing by on the Captain Cook Highway. The AAG-C raises with CAPL its concerns about future safety and security exposure from having large numbers of non-aviation people regularly gathering on the western side of the airport, and the heightened risk of community noise campaigns for a night-time curfew.</p> <p>Recommendation by AAG-C: That the final Land Use Plan contains:</p> <ul style="list-style-type: none"> • implementation options that include the revitalisation of the western side of Cairns Airport primarily for aviation uses, and • an independent risk analysis addressing safety management at the airport for future large gatherings of non-aviation people in proximity to the main runway. 	<p>Page 17 – E04 Page 18 – S05.1 Page 18 – S05.2 Page 18 – L05.1 Page 20 – L10.1 Page 22 – L03.1 Page 22 – E05 Page 23 – E06.1 Page 35 – O01 Page 35 – P01.2 Page 35 – P02.1</p>

Element	Document ref
<p>4B LACK OF OPTIONS – Obstacle Limitation Surface (OLS) intrusions</p> <p><i>Comment by AAG-C:</i> There are no options or alternatives provided in the draft LUP. Incrementally moving the main runway further east to mitigate the OLS intrusions on the western side of the airport has not been considered in the draft LUP. The draft LUP identifies the obstacle problem but does not consider other possible solutions.</p> <p>Recommendation by AAG-C: That the final Land Use Plan contains OLS intrusion mitigation options that include moving the runway 15/33 centreline east by widening its eastern side.</p>	<p>Page 19 – S09.2 Page 23 – S06.1 Page 24 – L01.1 Page 25 – L03.1</p>

AAG-C's stated positions

1. The AAG-C, on behalf of its members, would support a continuation and revitalisation of the western side of Cairns Airport as the future Mixed Aviation Zone for General & Regional Aviation activities. Those activities include:

- regional scheduled air transport services
- local and regional non-scheduled air transport services
- local and regional aerial work flights
- local and regional private/business and recreational flights
- an accredited industry training centre of excellence, and
- maintenance/overhaul/repair businesses that support them.

2. The AAG-C, on behalf of its members, would support options presented by CAPL to integrate complementary non-aviation commercial operations into the western GA precinct on the proviso they are located away from movement areas and security fencing.

3. The AAG-C supports and refers CAPL to the Federal Government's National Aviation Policy White Paper, in particular, to the following aviation goals:

- Aviation businesses should be able to innovate and develop new and improved products and services for the market
- Employment in the aviation industry should grow with more Australians training for and taking up jobs in the industry

AAG-C's stated positions continued

- Australians in regional and remote communities should have reasonable access to air services to major cities and other key centres
- A safe, efficient and innovative general aviation sector should be maintained to continue to provide essential air transport services and remain a key part of Australia's broader aviation industry
- Australia should continue to grow as a leading provider of aviation training
- There should be protection and fairness for aviation consumers and the broader community without imposing unnecessary cost or impeding innovation in the aviation industry
- Planning at Australia's airports should facilitate effective integration and coordination with off-airport planning ...
- Incentives to invest in Australia's airport infrastructure need to be balanced with fair pricing and transparency
- Recognition of the economic importance of airports needs to be balanced with better management of the impact of aircraft noise in the vicinity of airports and near flight paths.

The AAG-C recommends CAPL publish the above aviation goals in its final LUP and state how each has been addressed in the Plan.

Yours faithfully



Murray Ireland

Chairman, AUSTRALASIAN AVIATION GROUP – CAIRNS INC.
on behalf of the association's members