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Aviation White Paper
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AVIATION GREEN PAPER TOWARDS 2050 - DUBBO REGIONAL COUNCIL CONSULTATION RESPONSE

Thank you for the opportunity provide feedback on the Aviation Green Paper, and the subsequent commitment from the Federal Government in developing an Aviation White Paper toward 2050. Dubbo Regional Council acknowledges that the opportunities for aviation towards 2050 are as immense as they are daunting. Having consistent, enforceable, flexible, and robust planning regimes that support growth, innovation, and net zero goals whilst managing and protecting airspace is equally as challenging.

Council wishes to confirm its participation in the Australian Airport Association (AAA) forums and reiterates its support of the elements raised by regional airports through the AAA submission. Council appreciates the opportunity to provide further insights specific to the two very different aerodromes that are owned and operated by Dubbo Regional Council.

Dubbo Regional Airport

Dubbo Regional Airport (DRA), located 5 km northwest of the Dubbo CBD, serves as a crucial transportation hub for the Central-Western region of New South Wales. Facilitating direct connectivity with major cities such as Sydney, Brisbane, and Melbourne, as well as regional centres like Broken Hill, Walgett, Bourke and Lightning Ridge, the airport is vital for business, health, education, tourism, and emergency services in the region. The airport is the largest airport in the Orana and Central West Regions with a catchment population more than 200,000 persons.

Strategically located in the heart of Regional NSW, serving not only Western NSW but a large area of the Central West and North-West of NSW, the airport often transforms into an essential service provider in natural or man-made disasters delivering food, medical supplies, PPE, emergency personnel, crisis management teams, firefighting capabilities, and medical retrievals.



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Wellington Aerodrome

In contrast, Council also owns and operates Wellington Aerodrome, a designated aircraft landing area located 72 kilometres south-east of Dubbo. The aerodrome is a general aviation airport with an aircraft pavement limit of 5700kg. More recently, the facility has become attractive to a growing Advanced Air Mobility (AAM) sector, initially as a testing site for eVTOL aircraft with the opportunity for future expansion. The aerodrome is well placed for such activity due to its ease of use and a low number of aircraft movements. Wellington Aerodrome meets the CASA requirements for aircraft testing of eVTOL technology for the de-carbonising of air transport in an uncongested airspace. Current tenants including AMSL Aero, a home-grown Australian aerospace company, have established flight test facilities to complement their Bankstown headquarters. AMSL Aero have a clear mission to manufacture a safe aircraft that will ease the burden of traffic congestion on people's lives, give people more choice over where they can work and live, and most importantly, play a role in de-carbonising transport.

Renewable Energy Zone (REZ)

Wellington Aerodrome is located within the Central-West Orana Renewable Energy Zone (REZ). The first of its kind in NSW, the zone groups wind and solar power generation where power can be efficiently stored and transmitted, providing reliable clean energy, and reducing carbon emissions. These zones have substantial opportunities to capitalise on and share in the benefits of the energy transformation. With AMSL Aero as a key tenant at Wellington Aerodrome, the opportunity to expand on share in practices to achieve the goal of net zero carbon emissions makes sense as our economy transitions away from a reliance on fossil fuels to the production of sustainable aviation fuels.

Strategy

Dubbo Regional Council has implemented a diversification strategy through the implementation of a Masterplan to ensure the sustainability of the DRA. One of the strategic plans includes expanding airport activities to further support existing operations which provide support to business growth and expansion. The strategy continues investment in key infrastructure to support effective delivery of services including firefighting, which is critical to supporting communities in NSW. To date, the developments are driving Dubbo's continued growth and commitment to strong confident partnerships as well as emulating an ability to deliver projects and outcomes that support operations and align with Community Strategic Plans and Masterplans.

Council has a draft Wellington Aerodrome concept planning document to incorporate and strategically place facility locations to ensure compatibility and safe operation of both General Aviation (GA) and Advance Air Mobility (AAM) opportunities. The document speaks of the future of aviation and is aligned to the emergency service capability at Dubbo Regional Airport.

Connecting the Region

Whilst Regular Passenger Transport (RPT) services are an important component of the airport business, DRA also plays a critical role in supporting general aviation including medical transfers (Royal Flying Doctor Services and Air Med) and emergency services. Without State and Federal

support, Council risks the financial ability to grow airside assets that are vital to the economy, the connectivity of individuals and the protection of life and property.

Emergency Services Regional Hub

The airport's Emergency Services Precinct has continued to grow year on year and is regarded by Council as an opportunity to diversify income, service the community and secure long term tenants to both landside property precinct and Airside Operations.

Over the last three years, this Emergency Services Precinct has grown to accommodate new tenants including the NSW Rural Fire Service Training Academy and Aviation Centre of Excellence, State Emergency Services (SES) / Volunteer Rescue Association (VRA) Base Operations Facilities and Air Med Patient Transfer Operations. These services coupled with the existing services provided by the Royal Flying Doctor Service (RFDS), Orana Fire Control Centre (OFCC) and soon to be completed NSW Police Training Academy, position the airport as a Centre of Excellence for the emergency services.

Challenges and Opportunities

This submission highlights the challenges faced by regional airports, such as:

- Slot constraints,
- Differences between regional airports based on location and services provided,
- Infrastructure Funding Allocations for Large Regional Airport Hubs,
- High airfares,
- Aviation subsidies,
- Emergency Technologies Attraction fund,
- Capital investment and infrastructure maintenance costs,
- Policy, planning rules and regulations,
- PFAS mitigation and compliance costs,
- Skill shortages,
- Climate Change,
- Net zero implementation costs.

It also advocates for the potential opportunities in expanding on an established compliant aircraft decarbonising testing facility located at Wellington Aerodrome.

Our region has access to a readily available supply of grain and animal by-products that could be secured for the local supply, manufacture, and transportation of future Sustainable Aviation Fuels (SAF). Through the utilisation of Fletchers International Exports rail intermodal to Port Botany, the goals of achieving net zero goals for carbon emissions are possible in the Dubbo Regional Council Local Government Area.

Closing the gap considerations for Regional and Remote aviation:

- **Reviewing slot management systems**

Sydney Airport's slot management system is a key constraint in the domestic and regional aviation market with knock on impacts to regional areas. Consideration should be given to reviewing the Sydney Airport slot management framework.
- **Review of current regional airport classification**

The current classification of regional airports and the associated access to grant funding is based primarily on passenger throughput. Dubbo and Albury are very different service facilitators as regional counterparts like Newcastle and Gold Coast, yet they are all categorised as Regional Airports. Council proposes Government revise this criterion, in consideration of airport location and function. For example, Dubbo airport provides passenger services as well as a pivotal access point for State and National emergency and disaster support.
- **Infrastructure Funding Allocations for Large Regional Airport Hubs connected to Essential Services Facilitation**

Based on the reclassification (as above) to ensure continued connectivity and capability for emergency service delivery it is proposed that infrastructure funding for Large Regional airports be prioritised. This would ensure sustained connectivity, especially for emergency service delivery, recognising the critical role Large Regional Airports play beyond passenger traffic. These considerations aim to address the limitations and reframe the criteria for funding and infrastructure development for regional aviation, focusing on broader regional connectivity and emergency service facilitation rather than solely on passenger numbers.

Subsidies for Regional Aviation services considerations:

- **Productivity Commission inquiry into Cost of Regional Airfares**

Council strongly supports the Government's commitment for the Productivity Commission to undertake a standalone, public inquiry into the determinants of domestic airfares on routes to and between regional centres in Australia. Many families, choose to go on an international holiday to New Zealand, Thailand, Bali, or Vietnam instead of visiting a regional destination.
- **Introduce a national screening levy**

Deliver consistent protection and safety of travellers not based on aircraft size or throughput in passengers. The financial impact of screening passengers who commute to metropolitan areas from a regional area is an additional unwarranted impact on the cost of regional airfares. Businesses located in Regional Australia often fly to conduct business in metropolitan areas. More than 65% of the 200,000 annual airport users travel for business (Dubbo Airport Terminal User Satisfaction Survey 2023). For a globally secure aviation industry, all passengers should pay the same amount nationally - regardless of location.

- **Consider Expansion of Regional Air Service subsidy schemes**

Affordable subsidised airfares would act as a catalyst for change. This would reduce multiple population pressure points for metropolitan cities. Regional communities would become a choice for relocation due to affordable connectedness.

- **Emerging aviation technologies**

Councils need government support for AAM infrastructure. The adoption of electric hydrogen energy together with the emergence of electric vertical take-off and landing (eVTOL) aircraft types represent an opportunity to connect regional centres with metro centres away from major airports. Vertiport infrastructure should be a regional priority. Through a potential Regional Emerging Aviation Technologies Fund vertiports placed at convenient, practical regional locations represent an opportunity to connect regional centres with metro centres away from major airports.

Wellington Aerodrome is a case in point where Council has invested approximately \$150k in its facilities to secure the commencement of eVTOL testing by AMSL Aero. Government support for existing testing facilities located in regional destinations makes sense. AMSL Aero is confident that once advanced air mobility (AAM) technology is validated, opportunities will develop for aeromedical, firefighting, and cargo services, offering faster and cost-effective door-to-door delivery. These services align to the current service provision facilitated by RFS and RFDS from Dubbo Regional Airport. Emphasis should be placed on regional areas and centres as they represent the best opportunity test and prove the viability of AAM given the uncongested airspace.

- **Charging Infrastructure Airside and Landside**

Alongside the expected changes to propulsion technologies, regional airports will need to future proof its airport with charging and potentially hydrogen storage infrastructure. Government funds/grants would incentivise, fund, or drive infrastructure change to support the Governments net zero ambitions.

- **Review RPT screening processes to incorporate Technology**

Investigate ways to utilise technology in conducting remote screening for some, not all positions. Investment in technology to provide remote screening capability and centralising tasks to ensure increased safety outcomes and greater staff focus on immediate environment. This would address skill levels and skill shortages, reduce costs, and allow staff to focus on their core role, reducing the screening costs that further add to the cost of high airfares.

Funding for Inherited Legacy:

- **Provide Funding for PFAS Contamination**

The historical use of per and poly-fluoroalkyl substances (PFAS) in firefighting foams and large industrial sites is a significant issue for the aviation sector. PFAS presence at regional airports imposes substantial unplanned financial burdens on local governments,

inheriting this legacy from former federally owned airports. Dubbo Regional Council has already spent over \$200,000 for EPA compliance this year. The Australian Government must prioritise investigations into PFAS contamination at regional airports and explore compensation measures to facilitate site remediation and containment.

Establish Robust Planning, Regulatory Processes with Delegated Powers

The Australian Government needs to maintain a strong focus on developing air traffic management systems that prioritise safe and compliant operations, especially with the increased adoption of Advanced Air Mobility (AAM) leading to a rise in aircraft movements.

CASA is not an approving authority. They provide an advisory service for airport developments. If developments in the vicinity of airports are believed to create issues for operations, CASA will potentially impose operational restrictions on that airport. CASA have stated they won't object to a development, as they do not have the delegated authority to do so. This could mean an airport may be forced to operate with a reduced threshold if approved development impacts runway approaches etc. It is recommended that CASA have the authority to object and provide binding commentary as part of formal referrals for concurrence for developments around airports rather than solely relying on the aerodrome operator and Council Staff who may not have specialised aviation expertise. This would ensure a more informed decision-making process based on aviation knowledge.

Council suggests review of legislation to mandate the requirement for multistage developments in the vicinity of airports to be considered in their entirety rather than fragmented stages. This would enable thorough assessment to be considered, preventing issues that might arise from fragmented planning stages.

The Australian Government has been implementing in partnership with states and territories the National Airports Safeguarding Framework (NASF). The implementation of NASF in each state and territory, and in local government planning, is ongoing but is inconsistent across jurisdictions due to it being voluntary. NASF Guidelines should be included where practicable in development control plans and for the Department of Planning and Environment to prepare a supporting planning guideline to assist Council Officers with implementation and understanding of the NASF Guidelines.

Additionally, the Department of Planning and Environment should review standard clauses in respect of Airport operations in Local Environmental Plans to ensure they are fit for purpose and provide appropriate guidance to development proponents and Council officers.

These suggestions aim to strengthen regulations, improve decision-making processes, and ensure a more comprehensive and consistent approach to developments that effect airport operations.

Climate Change Challenges

Regional Airports are facing increasing challenges due to the growing number of disasters often linked to climate change. The financial burden of ensuring infrastructure capability of major transportation hubs like Dubbo Airport to assist in the coordination of delivering food, medical supplies, PPE, emergency personnel, crisis management teams, firefighting capabilities, and medical retrievals at a point where timing is critical, and access is best achieved via air. Ensuring optimum outcomes for community needs to be supported with fit for purpose airside infrastructure, noting that Dubbo Regional Airport's Large Aerial Tanker (LAT) base operations needs significant investment to allow 737 capability which goes beyond Council's ability to fund.

Investing in Infrastructure for Today

Key regional transportation hubs like Dubbo Regional Airport need to be supported to maintain the vital role they play in regional connectivity maintaining the strong linkages for business, tourism, medical and emergency services. Demonstrating fiscal responsibility, DRA intentionally quarantines \$2 per passenger for future airside asset renewal programs, yet the Capital funds required to improve capacity and capability despite efforts remain unattainable without assistance. Council would welcome affordable airfares offered through Bonza 737 RPT operations yet do not have the airfield infrastructure required for operations. Similarly, as mentioned the NSW RFS 737 LAT is unable to utilise Dubbo Airport for Aerial firefighting due to the runway strength and length limitations. Council is currently finalising a business case that supports asset investment to support operations, enabling more effective and efficient protection for aerial firefighting and as well as bringing cheaper airfares to community and welcoming more visitors to our region through Bonza RPT operations.

Investing in Infrastructure for Tomorrow

This submission stresses the significance of regional aviation's role in achieving net-zero goals and the importance of government support in funding future infrastructure to foster sustainable growth in the aviation sector for passengers and emergency service provision. As technologies develop, Regional Australia offers uncongested airspace and a willingness to partner with metro locations to deliver eVTOL technology for the future. Regional locations with readily available access to grains and bio-feedstocks are well positioned for the manufacture and supply of SAF. Additionally, Council has been involved in the planning process for a proposed development of a firming power station by Squadron Energy. This station will be capable of producing hydrogen, biofuels, and hydrogen gas blends.

Investing in aviation technologies can enhance regional communities by improving connectivity, fostering economic growth, and expanding opportunities. Upgraded infrastructure, efficient air travel, and accessible transportation networks can attract businesses, tourism, and vital services, ultimately empowering local economies and providing residents with improved accessibility and opportunities for development.

Role of Regional Airports

Dubbo Regional Council's response to the Aviation Green Paper emphasises the importance of Regional Aviation in connecting remote and regional areas to essential services, social services, and economic opportunities. Maintaining affordability of regional airfares, as well as achieving

net zero carbon emissions is equally challenging. Having consistent, enforceable, flexible, and robust planning regimes that support growth, innovation, and net zero goals whilst managing and protecting airspace as well as preparing a sustainable workforce that is skilled for the future is equally as challenging. The investment needed to plan, deliver, and maintain aviation infrastructure toward 2050, for a regional airport that delivers essential services as well as passenger services for all abilities is not one that can be solely funded by local Councils.

Council has a strong and collaborative track record in seeking out best practice, collaboration, and innovation, proactively working with airlines, aviation services, industry, regional stakeholders, and all levels of government. Council ask that the Government seriously review the points raised in this submission and build a strong framework for growth and connectedness for all Australians to better protect regional communities and ensure jobs, business, services, innovation and growth opportunities are at the forefront of decisions that are made today and toward 2050.

Dubbo Regional Council trusts that the information provided in its submission will provide a helpful insight into regional aviation and the policy drivers required to grow and promote regional aviation into the future.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Jane Bassingthwaite', with a long horizontal flourish extending to the right.

Jane Bassingthwaite
Director Organisational Performance