

28 November 2023

Director  
Aviation White Paper Office  
Department of Infrastructure, Transport, Regional Development, Communications and the Arts

Via Email: [aviationgreenpaper@infrastructure.gov.au](mailto:aviationgreenpaper@infrastructure.gov.au)

## MOORABBIN AIRPORT GREEN PAPER SUBMISSION

Thank you for the opportunity to provide a submission for the Aviation Green Paper. We reiterate and endorse the comments made in our submission for the Green Paper Terms of Reference. This submission supplements our previous submission.

### **Future Directions**

Safety should be called out as a driver of change.

Youth interest in aviation careers should be tracked within the education system. A better way to estimate the future aviation labour force, including pilots and LAMEs, is required and to provide comfort that demand can be met.

AAM careers need to be promoted and supported by Government through student finding. Preference should be given to existing flight training organisations who understand the complex aviation regulatory environment including airspace and safety. AAM business transition/expansion programmes should be created and funded by Government to grow existing businesses (particularly flight training & engineering).

The Australian Defence Force should be communicating its commitment (volume, type, timing) to sustainable aviation fuels for jet and piston engines. This is one of the few short-term options of scale Australia can initiate to ensure access to international fuel markets. Medium term supply contracts by Government are required.

GA demand based on historical trends should be carefully analysed. GA small businesses are facing material transition costs to move to sustainable solutions. It is unclear if historical GA business models are able to respond to changing market conditions. At the same time GA customers will increasingly prefer sustainable GA businesses and thus it is not an option for GA businesses to adopt a business-as-usual footing into the future.

Sustainable GA aircraft will require material investment. Given the age profile of the GA aircraft fleet, Government should be providing clear policy settings (including support available for GA flight training and whether existing piston driven aircraft will be allowed to continue to fly for the full life of the aircraft – i.e. 40 to 50 years into the future). GA aircraft fleet owners are making decisions to purchase aircraft now.

Detailed analysis is required from Government on the cost type and nature of the GA fleet moving to electric. If the aviation sector is similar to the motor vehicle sector – setting up an engineering workshop to service electric aircraft is not unlikely to require a 7 figure investment by small aviation businesses, particularly if servicing the aircraft is restricted to engineers with particular training/accreditation from manufacturers.

Aviation technologies must be mandated in controlled airspace and over metropolitan areas. This is especially true at flight training airfields - transponders, ADS-B in & out should be compulsory now. As airspace changes to support AAM activity, the need for all aircraft to be fitted with basic equipment is heightened – safe outcomes at scale and complexity are harder to deliver where aircraft (including GA and drones) are not able to be tracked and scheduled.

GA workspace skills are best guaranteed by introducing more youth to aviation at an early stage and in a structured way. The aviation industry would be well placed to adopt many of the initiatives used in STEM career marketing. Government should undertake research on how to inspire youth to take up an aviation career – Aviation Museums and inspirational aviators and aviation professionals remain great options and would benefit from additional Government support.

Government should be collecting and analysing available aviation data from expanded sources, including ASA, CASA, CRICOS, aircraft sales etc. Supplying analysis by market segments, and in particular flight training and engineering, will be increasingly useful to aviation business plans.

### **Competition**

Government ongoing funding for regional airports will support competitive flight training outcomes, add to regional aviation skills and increase destinations for navigation training exercises. The stronger the general aviation airport network, in both urban and non-urban areas, the more resilient the GA training sector will be.

There are 10 general aviation airports within approximately 60km of the Melbourne CBD, many supporting growing urban areas, and all would benefit from government funded infrastructure and special use flight training accommodation to further attract flight training near these airports.

Government funding of infrastructure and facilities at some but not all general aviation airports may create market distortions. Equally quality general aviation airports will attract flight training operators – either new and or satellite hubs of existing businesses.

Government programmes to better support differently abled access to general aviation could be expanded. Introducing differently abled people to small aircraft, pilots and general aviation airports is often wholly funded by general aviation aero clubs. This should change.

### **Regional**

AAM opportunities in regional areas will require metropolitan linkages for drone servicing, repairs and connections with freight / distribution hubs. Skilled personnel in the medium term are more likely to be in metropolitan areas. metropolitan airports provide this access opportunity and regulations should be drafted to support these outcomes including AAM activity in metropolitan airports.

Climate responses by metropolitan airports in many cases include the self-funded construction of storm water infrastructure including dry retarding basins and airfield drainage networks.

As urban development and population density increases and there are fewer spaces for fauna – airfields increasingly risk becoming default rest/ recuperation areas for birds and wildlife. Airport safety responses include increased use of noise, harrising and removal of food and water sources. Fire risks associated with vegetation, including how climate impacts flora related fuel loads, on and near airports require ongoing management.

### **Net Zero**

Please refer to our attached previous submission and comments above.

### **Development and Planning**

The increasing regulatory and compliance costs for airport developments of all types should be reviewed. This is particularly relevant as privatised airports have increasingly mature, effective and well shared building activity processes.

Government should increase programs to continue to explain building activity processes on airports. Smaller aviation businesses, in both metropolitan and regional areas, would greatly benefit. As building related works may be infrequently undertaken by general aviation businesses and as these aviation businesses are on airfields that are quite distinct from other

planned areas of our cities and towns, additional Government communication would assist to inform communities about the regulatory regime.

Aircraft noise impacts can be further explained with the assistance of local councils adding additional information to their websites and into welcome packs for new residents. Increased participation with local residents by general aviation aircraft owners, business and recreation, would expand the opportunity for residents to better understand how general aviation benefits the community and more details on why aircraft make noise. Aircraft noise disclosure requirements for real estate agents and home sale websites/ applications would materially help to reduce the uninformed purchaser under flight path. The existing section 32 vendor disclosure statements in home sale contracts have not proved effective to widely inform the community – largely because most purchasers do not read home sale contracts in detail.

Major development plan (“MDP”) thresh holds should be increased to \$50 million and indexed to inflation. Non-controversial developments should be able to proceed without the cost and delay of MDP processes. Specific carve outs should be introduced for sustainable features of developments which may increase build costs materially e.g. using cross laminated timber instead of structural steel.

NASF should be included within local planning schemes – whilst being reference documents is a good start, full inclusion will further encourage off airport compliance with NASF. Requiring airports to be continuing to assess complex, changing, multi-million dollar developments off airport, including for NASF, is a failure of Government policy and requires immediate redress. Equally the current state planning systems effectively require airports to join/ make statements into off airport planning scheme cases – at great cost and resource diversion.

Local Councils have a material role to achieving NASF consistent outcomes. Where NASF assessments by Councils are not a planning scheme regulatory requirement, council planning departments may not require applicants to comply with NASF. NASF related training for Council staff and the employment of aviation specialists would benefit many councils and support improved outcomes. Local planning schemes requirements for Councils to assess off airport crane activity within CEMPs would greatly improve existing council development processes.

CACG content can be improved by availability of additional online government resources and information. This may serve to improve the perception of CACG independence.

Requiring airports to include future land use options, including those considered and not being progressed, for aviation sub precincts may reduce negative perceptions some aviation businesses experience when presented with alternative layouts. Airport design is a highly complex and skilled activity that needs to respond to many requirements including regulations, airport role, airfield infrastructure, sustainability initiatives, utility infrastructure, main aviation uses, customer needs, aircraft types, proximity of aircraft parking, residential areas and importantly ultimate practical capacity that the airspace of an airport can support.

Airport legacy precinct layouts as a means to support thriving future general aviation precincts needs to be carefully assessed by Government. As widespread community support drives electrification, aircraft noise, sustainability, differently abled access, airport planning responses will require change. Airspace access, including circuit training flight paths, are a main constraint for general aviation flight training airports. Master Plans should continue to be used for this purpose.

## **General Aviation**

Please refer to our attached previous submission and comments above.

Government funded inclusion, equity and diversity programs for metropolitan airport based aviation businesses should be a priority. Smaller aviation businesses have limited self-funding for such important programmes.

General aviation committees should include airport industry representation. Several ongoing general aviation committees have either never, or not for the past 10 years or so, had an airport committee member. Whole of industry participation in these committees may yield greater perspective and improved outcomes.

Government provided information on all aspects of electrification, including aircraft, facilities, infrastructure and vehicles would be appreciated. Similarly information on safety risks and responses to fire and other events should be a priority.

Government funding and support for general aviation next generation incubators/ passion inspiring places should occur ASAP. Aviation museums, aviation school kits for primary students/ careers advisors and expanded RAAF interactive mobile aviation career displays are higher effective inspirational options for our youth.

Positive general aviation stories and communications should be a priority for Government. There are many positive aviation stories that could be showcased such that online searches would provide a more balanced view of the industry. In turn this should lead to increased take up of flight training and engineering careers. Mainstream media and a handful stakeholders focus on negative issues to the detriment of the whole general aviation industry.

We look forward to continuing constructive engagement with the Department in relation to the Aviation White Paper. Please contact us if you require further information.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Paul Ferguson', written in a cursive style.

Paul Ferguson  
Chief Executive Officer

## APPENDIX 1 – MOORABBIN AIRPORT TERMS OF REFERENCE SUBMISSION

10 March 2023

Aviation White Paper Branch  
Domestic Aviation & Reform Division

Via Email: [aviationwhitepaper@infrastructure.gov.au](mailto:aviationwhitepaper@infrastructure.gov.au)

### RE MOORABBIN AIRPORT TERMS OF REFERENCE SUBMISSION

Thank you for the opportunity to provide a submission for the Aviation White Paper Terms of Reference.

#### **Scope & Theme: How to maximise the aviation sector's contribution to achieving net zero carbon emissions including through sustainable aviation fuel and emerging technologies**

Metropolitan airports are well placed to deliver and support sustainable operations and this should be recognised in aviation policy. We seek Government to:

- Recognise one size fits all policy solutions for aviation results in sub optimal outcomes, policy should specifically consider the general aviation sector;
- Create an industry knowledge hub to identify, gather and distribute current and emerging technology initiatives for general aviation businesses, metropolitan airports and the community
- Create a sustainability scorecard for metropolitan airports that tracks airport sustainability including initiatives commenced/ completed, future initiatives, funding capability and takes into account limitations that smaller airports face (e.g. limited land for solar farms, heat islands)
- Create policy that supports identifying industry best airport design and infrastructure solutions for sustainable outcomes (e.g. at Moorabbin activating hangar sites and aircraft parking areas closer to the airfield results in a 6-12 minute battery run time reduction as legacy sites at Moorabbin were between 1 – 2.5km from holding points. Similarly efficient taxiway redesign minimised ground running time and reduced energy consumption). Government needs to understand and support change for sustainability.
- Adopt Circuit Booking Systems at training airports as a standard airspace management procedure– at Moorabbin this 2017 initiative has reduced aircraft wait times for circuit training airspace access to near zero resulting in 10's of thousands of litres of avgas saved.

We seek policy change that supports regulators to remain ahead of the technologies, facilitating on a timely and low cost to industry basis:

- Certification of new aircraft
- Certification of alternate fuels (low or no lead, SAF, hydrogen)
- Inclusion of next generation of sustainable aircraft in syllabus materials at all levels (high school, training organisations, universities etc)
- Increased recognition of training elements in simulators
- electric aircraft operations.

This may include government having engineering and scientific capabilities.

**Scope & Theme: changing aviation technologies and ways to position our policies, regulations and systems to encourage uptake and manufacturing of new, more efficient, transport technologies**

Metropolitan airports are well placed to trial and assess changing technologies. We are mature sites with access to reliable offsite power networks, trained and skilled workforces and are proximate to industry innovators. Further Metropolitan airports and our stakeholders have already invested into emerging technology, including electric aircraft (e.g. our largest rotary operator has forward orders for more 40 electric aircraft and major Victoria aviation universities with leading innovation and sustainability hubs have decades long aviation courses based at Moorabbin).

Schools, universities and training organisations should be required to include aviation sustainability in their curriculums to better inform our next generation of pilots and their families that sustainable aviation is achievable and the emerging industry norm. This will provide true transparency at a grass roots level on a major aviation industry change. Further it is our view that flight training organisations and general aviation businesses that adopt sustainable practices will hold an increasing competitive advantage both locally and internationally.

Government funding for aviation training programs (pilots, engineering) and VISA requirements should preference sustainable aviation organisations.

Airspace policy changes we support include:

- mandatory requirement for aircraft transponders in controlled airspace (VH registered, RA AUS)
- a clear pathway for logistics facilities at airports to implement drone based delivery operations
- Redraft airspace management procedures to support electric aircraft operations noting limited battery life and requirement for minimum of 30-minute fuel / electric power reserves (e.g. numbers of aircraft in circuits, mix of aircraft types in circuits, efficient access to airspace noting limited battery life)
- protecting and expanding existing off airport training areas so as to allow next generation aircraft (electric and hydrogen etc) to conduct advanced training elements over non built-up areas.

Next generation aircraft type take up will be led in metropolitan airport settings as we have highest GA clusters in the state and our customers have the largest fleets. This requires:

- Regulatory change to certify new aircraft types through CASA
- Certification of new fuel types
- Land use reviews and guidance for exclusion zone or extended PSA for new fuel type storage
- A roadmap to inform investment decisions for the general aviation industry. We are aware of a university acquiring 22 new single engine lead fuelled piston aircraft, this may limit their ability to invest into next generation aircraft in the immediate term.

Airports are investing and designing infrastructure under 20-year master plans and we need to understand the transition process to new systems. Policy needs to cover:

- Runway, taxiway and apron requirements, including widths and strengths to support new types
- Electric battery performance capability materially impacts land use planning and airport design and prioritises activation of hangar sites and aircraft parking closer to the airfield
- Fuel storage implications and surrounding protection zones
- Greater clarity on airport ability to recover infrastructure investments when technology and aircraft types in common use change. We need to avoid airports investing in infrastructure that is not required in the long term – e.g. avoid the A380 experience

- Airservices technical capabilities should be completely upgraded to improve safety, airspace management and reporting to airports and community
- Recommend remote active surveillance of flight training operations by CASA and ASA to improve safety of operations
- Master Plan requirements to include more comprehensive sustainability initiatives

**Scope & Theme: how to support and regenerate Australia’s general aviation sector**

The General Aviation industry requires advocates across all sectors of industry, this includes individual voices for regional and metropolitan airports, maintenance and flight training.

Policy should recognise that general aviation includes large numbers of small businesses and may lack experience in understanding:

- business planning and commercial processes
- key touchpoints for safety, planning and collaboration forums
- true cost of providing and maintaining airport network infrastructure and supporting services and fair pricing to recover these costs.

Regulator / Stakeholder input is important and necessary

- Greater data sharing of basic general aviation industry KPIs
- Greater involvement in community forums to reinforce roles of airports and provide future outlooks

Red tape minimisation, including the certification of new aircraft listed above:

- Reviewing the need ASICs at metro and regional airports e.g. 2000 ASIC issued at Moorabbin due to a single RPT operator
- Metro airports should remain out of ACCC monitoring
- Certification of roles within small business, opportunities to perform simultaneous duties
- Reduced hurdles on international supply chains, particularly for parts and components as new aircraft enter industry

We need to encourage young people into Aviation and make flying accessible by:

- Developing pathways – greater promotion of aviation in schools at early ages
- Reducing complex loan structures – streamline VET Fee to remove delay in payments to schools who are cash flow dependent
- Reviewing training syllabus
- Greater use of simulators
- Removing complexity of maintenance training – LAME qualifications are restrictive and not transferable outside of aviation, not internationally recognised
- Reducing cost and providing incentives for manufacturers and schools to adopt sustainable aircraft and systems in training syllabus
- Making airspace accessible – improved sharing of airspace not currently available to GA
- Improving alignment of regulations to international standards where possible

**Scope & Theme: other significant issues raised during the consultation process.**

Other items that we would like to see considered in the Aviation White Paper are:

- Airport role clarity – metropolitan, secondary and regional airports roles and functions should be clearly defined together with the airport services and infrastructure that are specific to those roles.
- Metropolitan airports
  - acceptance that airports are urban activities
  - recognition of airport benefits to community – network infrastructure improvements on airport to off airport, public transport creation, Fly Friendly programmes, economic etc

- Positive role for supporting connecting major infra projects (e.g. suburban rail loop)
- Strengthening of requirements for offsite development building activity. Large areas around airports are being redeveloped into larger facilities and longer builds are now common. Local and state governments, as well as developers, have little or no aviation awareness for NASF implementation and consultants with relevant experience are limited. The present system for airports to process controlled activity applications is unsustainable, costly, time consuming and requires immediate regulatory change to allow cost recovery or outsource.
- Airport head leases to be amended to allow immediate exercise of option terms to provide investment certainty for airports and customers.
- Clear direction on EGLT and EGCR
- PFAS Resolution – clear pathway and timelines provided
- Centralised information sharing and reporting for hazards & risks we face as a sector
- Greater support for financial debt management for operators and airports.

I look forward to continuing constructive engagement with the Department in relation to the Aviation White Paper and participating at the roundtable events later this month. Please do not hesitate to contact us if you have any further queries or questions.

Yours sincerely



Paul Ferguson  
Chief Executive Officer