



Peninsula Aero Club

Response to the Aviation Green Paper – Towards 2050

The Peninsula Aero Club owns and operates the Mornington Peninsula Airport at Tyabb, Victoria (“Tyabb Airport”). Approximately 45 other entities based on or adjacent to the airport make up the airport precinct and provide more than 100 jobs.

Peninsula Aero Club’s considerations of potential challenges in the Australian aviation industry, specifically within the general aviation sector – The Aero Club, its Flying School and Tyabb Airport require a supportive legislative and regulatory framework, improved aviation industry linkages and a community acceptance of the local benefits, to adequately operate and develop in the long-term:

1. Airports – competition and consumer protection

1.1 A competitive aviation sector

* Tyabb Airport and the Peninsula Aero Club (PAC) provide the only developed aviation landing (fixed wing and helicopter) facilities, aircraft hangarage, training school, maintenance organisations and aero club on the Mornington Peninsula. This means that there is potential to become part of an improved integration of aviation services, based in the south eastern sector of Melbourne, in the long term.

1.2 Airport and Consumer protections

* While the Aero Club has been in existence for over 60 years, to remain viable the Airport, Flying School and Aero Club continue to require appropriate support and approval by Federal, State and Local government, including planning support.

1.3 Social licence

* A VCAT Declaration confirming use under existing permits has allowed the airport maintain operations as per the previous 60 years. The majority of local residents consider the airport and club to be a local asset, a significant employer and economic contributor to the community, as well as regularly partnering with the community and local charities. The Club’s Fly Neighbourly Advice approach endeavours to minimise aircraft impacts on residential and township areas, and the reporting system, inclusive of Air Services Australia as the Responsible Authority for aviation noise, responds quickly to any noise complaints to maintain the Club’s generally accepted social licence.

2. Maximising aviation’s contribution to net zero

2.1 Sustainable aviation fuel

* PAC will continue to work with the oil industry to support SAF when it becomes available either by legislation or by demand. In the meantime, PAC is investing in an additional Unleaded fuel option AvPULP to limit neurotoxins and heavy metals in the environment.

2.2 Electric and hydrogen powered aviation

* As alternative powered engines become available some Club Member’s will invest in them in the longer term.

3. Airport development planning processes and consultation mechanisms

3.1 Land use planning on and off-site to airports

* Surrounding land use planning of airports requires a harmonised approach to be considered fair by all stakeholders. However, the viability of airport operations requires appropriate town planning controls in relation to residential encroachment, obstructions and compatible land use.

3.2 Community consultation mechanisms

* Community consultations are vital to ensure good relationships between the aviation industry and the community within which they operate. Key aspects to reasonable consultation mechanisms require competent, qualified and timely advice to be provided.

3.3 Noise Management

* With increased populations living close to airports, owing to poor town planning management, the acceptability of occasional aircraft noise can become a concern to some residents. While current AS building noise standards are appropriate, it is considered that Councils need to be more diligent in adhering to these standards during town planning.

4. General Aviation

4.1 A growing general aviation sector

* The growth of aviation means that to remain viable adequate, and relevant training will be required at all levels. PAC is committed to providing initial and recurrent training to all members, staff and contractors.

4.2 Workforce skills and training requirements

* The Flying School provides a wide range of training for pilots covering RAAUS Certificate; Licenses – Recreational Pilot, Private Pilot, Commercial Pilot; Ratings – Instrument, Multi Engine Class, Instructor, Night VFR; and Endorsements - Controlled Airspace, RPL Navigation, Tail Wheel, Aerobatic, Formation. This results in the Flying school being the provider of well qualified pilots available to move within PAC roles and into aviation work at other Aero Clubs, Regional Airlines and Domestic and International Airlines.

* With this acknowledged quality and level of training, if integrated with a possible tertiary partnership(s) could provide a training pipeline for some of the expected demand for well qualified and experienced pilots for the medium to long term in Australia.

* There is currently a dire shortage of qualified aviation maintenance personnel. A number of AMEs and LAMEs work within the Airport Precinct, leading to the possibility of PAC, in conjunction with local Companies and the Flying School, to become a provider of local maintenance engineering training.

5. Fit-for-purpose regulations

5.1 Role of government and agencies

* The role of government and agencies, in a highly competitive and evolving aviation industry, needs to adequately support and guide all levels of aviation from the majors down to Aero Clubs. PAC considers that, as a lower tier but lead-in operator, ongoing support is fundamental to enable PAC to not only exist but to improve operations over the near, medium and long term.

5.2 Safety regulation

* Safety Regulations are being improved by CASA but still result in significant effort by an Aero Club and Airport to meet detailed requirements, particularly where multiple operations are covered in different CASRs. Continuing to simplify requirements, as evidenced in overseas regulations, is to be encouraged. The current cost of compliance is significant and often not justifiable for the size of small operations. The level of regulations is not proportional to the risk or type of operations, where most of the regulations are of “one size”, be it for an international airline operation or a country aero club.

5.3 Airspace regulation and management

* It is obvious that future Airspace regulation and management will require significant thought, planning and input from all stakeholders to be fit-for-purpose and readily implemented. PAC is interested in being involved further in these considerations as we believe there is scope to develop a “sized right” approach to make GA aviation both affordable and safe.

5.4 Agency funding and cost recovery approaches

* To enable Australian aviation to develop at a pace needed to remain relevant, in the context of world aviation, adequate agency funding will be critical. Cost recovery from lower tier level organisations will need to be assessed by recognising the difficult cost climate likely to be experienced over the next few decades.

5.5 ‘All hazards’ regulatory approach

* PAC supports this approach, whereby lessons learned by others can be applied locally.

6. Emerging aviation technologies

6.1 Enabling the uptake of emerging technologies

* Any emerging technologies that would prove advantageous to PAC will be reviewed by the Committee of Management on a case-by-case basis.

6.2 Advanced Aviation Mobility (AAM) and Vertiport

* Given the current acceptable use of helicopters at Tyabb Airport it is likely that AAM will be considered in the medium term based on demand, CASA/Council approvals and community acceptance.