

The Hon Catherine King MP

Minister for Infrastructure, Transport, Regional Development and Local Government.
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(including by email: Minister.King@mo.infrastructure.gov.au)

Copy to (by Email):

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Dear Minister King,

Re: Aviation White Paper – Terms of Reference submission

Thank you for the opportunity to provide a submission to the attached Aviation White Paper Terms of Reference (**Terms of Reference**), which will *“chart the course of Australian aviation through to 2050 and articulate the long-term policy directions for the aviation sector”*.

Aeria Management Group (**AMG**), formerly Sydney Metro Airports, operates both Bankstown Airport and Camden Airport which are a bases for flying schools, charter, aircraft maintenance, tourism, emergency services and recreation including private business aircraft operations. Our airports are strategic general aviation gateways within the Sydney Basin, contributing to over \$1.6bn and 10,000 jobs to the NSW economy across over 170 businesses and growing.

With 770,000 new pilots required in the next twenty years and a projected shortfall of 80,000 pilots estimated by 2032, our airports contribute to addressing the global pilot shortage by providing established airport infrastructure and designated airspace training areas close to the airports for flying training and upskilling.

The proposed scope and themes of the Terms of Reference include important areas such as aviation’s role in economic development, maximising the contribution of the aviation sector, being prepared for new technologies, Sustainable Aviation Fuel, airport development planning, and maintaining fit-for-purpose aviation safety. Of particular relevance to Bankstown Airport and Camden Airport, is the scope addressing *“how to support and regenerate Australia’s general aviation sector”*.

AMG submits the following amendments and/or additional themes for the Terms of Reference:

- 1. Impacts of major aviation infrastructure advancements on General Aviation airports and operators, including emergency services***

AMG submits that the Terms of Reference include how the current unfolding nature of the Australian aviation sector, specifically regarding the expansion of major capital city airports and related new airport infrastructure, will affect both surrounding airspace and access relating to the capital city GA airports.

Expansion of the major capital city airports in Australia currently includes:

- Commencement of Western Sydney International (Nancy-Bird Walton) Airport;
- Opening of the parallel runway at Brisbane Airport;
- Planning for the parallel runway at Melbourne Airport; and
- Planning for the parallel runway at Perth Airport.

Whilst the above aviation infrastructure advancements are important for the Australian economy and the aviation sector, there are potential adverse consequences for other aviation users located surrounding these airports. In particular, resulting amendments to airspace are anticipated to impact GA airports including Bankstown Airport and Camden Airport, and also Archerfield (QLD), Essendon (VIC), Jandakot (WA) and Moorabbin (VIC):

- Convenient and accessible airspace is important to ensure viable flying training, and any adverse changes to airspace for GA operators has the potential to increase the cost of aircraft hire and training lessons with longer travel times, restricted flight paths, and increased noise impacts on community, should aircraft be required to remain at lower altitudes for longer.
- Airspace changes may also affect how emergency service aerial platforms access newly quarantined airspace potentially delaying the preservation of life.

The National Airports Safeguarding Framework (**NASF**) provides guidance on planning requirements for development that affects aviation operations. This includes building activity around airports that might penetrate operational airspace and/or affect navigational procedures for aircraft. The framework does not include requirements on airport operators to consider the impacts of changes to their operations on other airports in their vicinity. The Terms of Reference should consider additional Guidelines under the NASF to require formal consideration and consultation of the potential impacts.

2. Simplification of compliance frameworks applying to mid-sized General Aviation airports and smaller aviation operators

Additionally, when considering “*how to support and regenerate the general aviation sector*” and its associated required infrastructure such as mid-sized airports (e.g. Camden Airport), AMG recommends that the Terms of Reference consider how to deliver a fit-for-purpose compliance framework for small GA airports and operators (including recreational aviation operations) so as to not adversely impact on the growth of general aviation operations by compliance frameworks primarily directed at major airports and their associated larger aircraft operators.

3. Themes when considering how to support and regenerate Australia’s general aviation sector

The following themes or challenges should be included in the consideration of how to support and regenerate Australia’s general aviation sector:

- The significant cost of upgrades required for ageing aviation infrastructure at essential gateway general aviation airports;
- The significant and increasing costs of hangar construction and how to promote the growth of general aviation business and operators in this context; and
- How to maintain and grow an internationally competitive general aviation industry, including attracting international business and operators to general aviation airports.

Thank you again for the opportunity to provide a submission to the scope and themes to be covered by the Aviation White Paper. Please do not hesitate to contact either myself or AMG General Manager Aviation, David Binskin on 0418 295 305 or david.binskin@aeria.co.

Your sincerely,



Daniel Jarosch
Chief Executive Officer
Aeria Management Group

ATTACHMENT Aviation White Paper Terms of Reference

Scope and
themes

The White Paper will examine the Government policy and economic reforms necessary to promote efficiency, safety, sustainability and competitiveness of the aviation sector out to 2050. Areas to be considered include:

- aviation's role in economic development, trade and the visitor economy – general, domestic, regional and international aviation;
- how to maximise the aviation sector's contribution to achieving net zero carbon emissions including through sustainable aviation fuel and emerging technologies;
- changing aviation technologies and ways to position our policies, regulations and systems to encourage uptake and manufacturing of new, more efficient, transport technologies;
- airport development planning processes and consultation mechanisms that consider the impact and changing nature of aircraft noise and related expectations on the role of noise sharing and noise mitigation;
- how to support and regenerate Australia's general aviation sector;
- future industry workforce skills and training requirements;
- appropriate consumer protections and access to services;
- maintaining fit-for-purpose aviation safety, air navigation and aviation security systems and service delivery agencies;
- the role of airlines and airports in supporting regional economies; and
- other significant issues raised during the consultation process.