

19 October 2022

Director,  
Airport Reform  
Sunsetting and IFAM Section, Airports Branch  
GPO Box 594  
CANBERRA ACT 2601

By email to: aviationreform@infrastructure.gov.au

Dear Director,

The General Aviation Advisory Network (GAAN) thanks the Department for the opportunity to respond to its consultation paper in relation to Stage 2 of its review of the *Airports (Control of On-Airport Activities) Regulations 1997*.

As you are aware, the GAAN has been established to provide advice to the Minister on matters affecting the general aviation (GA) sector. Members of the Network have been selected for their skills and expertise in the aviation industry, and work collaboratively to respond to pressures facing the GA sector. They come from a cross section of the diverse GA sector, covering rotorcraft and fixed wing services, including flight training, sport, recreational, regional, business, aeromedical, remotely piloted aircraft systems and aircraft maintenance.

Over the last two years, the GAAN has given much consideration to the challenges faced by the general aviation sector under the current economic and regulatory arrangements that apply to metropolitan secondary airports, most notably in our paper *A New Strategy for the Australian General Aviation Sector*<sup>1</sup>. The GAAN's letter of 2 March 2022, in relation to the earlier Stage 1a consultation, drew your attention to the problems which cause members' concerns, consistent with the GAAN's strategy.

The GAAN does not seek to comment on matters that do not support policy outcomes within its terms of reference. Accordingly, we offer the following brief response in relation to a few matters of interest that fall under Stage 2; and other than state that the fundamental purpose of an airport must be to facilitate the operation of aircraft, consider that measures affecting the sale of liquor, consumer retail trading hours, gambling, or smoking lie outside the GAAN's terms of reference.

#### **Landside Vehicle Parking – Regulation Part 4**

Whilst strict regulation of landside vehicle parking and airside access is essential at the capital city primary airports, great care is needed in regulating these facilities at the leased secondary airports. In particular, it should not be possible for an airport operator to use the existence of regulatory control to implement egregious and unnecessary parking controls that serve no purpose except to increase the airport operator's revenue. As an example, the imposition of chargeable, time-based metered parking at secondary airports where there is no

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<sup>1</sup>The paper may be retrieved at <https://www.infrastructure.gov.au/sites/default/files/documents/GAAN-New-Strategy-for-the-General-Aviation-Sector.docx>

demonstrable need for parking controls disproportionately disadvantages employees of on-airport business, including maintenance personnel, flight crew and others who have no alternative parking available. The Department should ensure that on-airport parking for General Aviation employees and participants is never subject to arbitrary and uncompetitive charges by airport operators or government at any tier. It follows that the GAAN would also be most concerned about any proposal which extended the coverage of PINS to any of the current Non-PINS airports, other than Western Sydney Airport.

#### **Airside Vehicle Access – Regulation Part 4**

It is noted that one option in the Consultation Paper, in relation to airside access, calls for “nationally consistent” airside vehicle access. This notion would be unworkable without accompanying risk-based classification tiers, since smaller airports, and particularly the secondary ones, have few or no high-capacity aircraft movements and the inherent flexibility required by General Aviation cannot be achieved unless operators can move freely between buildings, facilities and aircraft in a range of vehicles, consistent with risk and airport movement area design. In the absence of a detailed proposal, it is difficult to see how this would be achieved on a “nationally consistent” basis. At most secondary airports, taxiways and aprons are many decades old, and no consideration was given at the time they were designed to any requirement for restricted airside access. We urge the Department to exercise caution in this matter.

#### **Overarching Concern: General Aviation Jobs and Growth of the Sector**

The GAAN has identified the importance of addressing the following aspects of airport planning and development at the privately leased metropolitan secondary airports:

- Security of tenure and access to suitable property leases for aviation businesses;
- Parity or otherwise with normal commercial lease arrangements; and
- Impact on general aviation businesses, employment, skills and the wider economy.

The GAAN strongly believes that the Australian Government should revise its policy towards the approval of leased secondary airport master plans to ensure that the interests of the GA sector are adequately protected.

The Network would welcome the opportunity to elaborate its views with your office directly.

In the first instance, contact may be established through the GAAN Secretariat by e-mail ([GAAN.Secretariat@infrastructure.gov.au](mailto:GAAN.Secretariat@infrastructure.gov.au)).

Thank you for considering the general aviation sector’s perspective in this matter.

Yours sincerely,



Andrew Andersen  
Chair