

17 October 2024

Anthony Nugent
Section Manager
Office of Airspace Regulation
Civil Aviation Safety Authority
GPO Box 2005
Canberra ACT 2601

Sent by email

Dear Anthony,

Re: Bankstown Airport Southeast VFR Corridor

Aeria Management Group (AMG) welcomes the opportunity to make this submission in support of CASA's proposed Bankstown Airport Southeast VFR Corridor (Corridor). We have separately provided this submission via the webform on the CASA website.

AMG is the manager and operator of Bankstown Airport and Camden Airport, which provide essential services for people and businesses across NSW, including emergency services, aeromedical transfers, flight training and a multitude of other General Aviation (GA) operations.

We have invested more than \$530 million in our airport precincts over the past decade and have a further \$120 million in the forward investment pipeline, in support of the sustainable operations and the growth of GA and our precincts.

In line with that commitment, we join our airport operators in supporting CASA's proposal to reclassify a portion of airspace southeast of Bankstown Airport to uncontrolled airspace and create a corridor for use by all aircraft flying under Visual Flight Rules (VFR), up to 1500ft.

We endorse statements by CASA and Airservices Australia that the Corridor will:

- Reduce airspace risks associated with the constrained nature of the Bankstown control zone and sustained growth in air traffic in the region and improve aviation safety outcomes;
- Provide improved safe access to Sydney flight training areas; and
- Provide equitable and efficient access for airspace users.

Safety imperative

The need to address safety risks associated with and adjacent to Bankstown Airport airspace has been evident for at least the past decade, following several safety incidents in and around the Bankstown control zone, including a fatal midair collision in 2008.

To reduce such risks, multiple aviation officials and expert groups have recommended the introduction of a VFR transit route southeast of Bankstown Airport, including:

- In 2014, CASA and Airservices Australia established the Bankstown Joint Airspace and Procedures Analysis Team (JAPAT), comprised of subject matter experts, to identify and assess safety risks associated within and adjacent to the Bankstown Airport airspace
- In 2015, JAPAT began assessing the establishment of a VFR transit corridor to reduce such risks

- In 2016, JAPAT's Final Report recommended the establishment of a VFR corridor
- In 2020, JAPAT was replaced by the Bankstown Airspace Conflict Management Group (BACM)
- In 2022, CASA initiated an Aviation State Engagement Forum (AvSEF) proposal to establish a VFR corridor to reduce the risk of airspace collision, after the proposal was agreed to by BACM.

Such safety risks and hazards to pilots and aircraft passengers are persistent and growing, due to the constrained nature of the Bankstown control zone and sustained growth in air traffic in the region, which will be exacerbated by the commencement of Western Sydney International Airport (WSI) and related airspace restrictions, in 2026.

Economic imperative

Bankstown Airport is NSW's premier base for flight training schools, which together support more than 500 new students a year. Maintaining a strong supply of pilots is critical to meeting the growing needs of Australian passengers and businesses.

As stated in the Australian Government's Aviation White Paper, released in August 2024, shortages of aviation professionals – particularly pilots and engineers – are worsening, especially in regional areas, forcing aviation businesses to reduce services. A similar decline in the number of flight instructors has the potential to compound pilot shortages by reducing the GA sector's capacity to train new recruits, the White Paper states.

More broadly, persistent workforce shortages are a key risk to Australia's long-term productivity and economic growth.

Amid such pressures, the need to support flight training schools in Greater Sydney, Australia's largest population and workforce centre, is greater than ever.

Ensuring efficient access to Sydney flight training areas is critical to the ongoing operations and viability of flight schools at Bankstown Airport. The Corridor will provide direct and shorter access for flight training schools between Bankstown Airport and flight training areas in the southeast, substantially reducing travel times and costs.

Similarly, the provision of a Class G transit route to and from Bankstown Airport will reduce the financial and operational impacts on smaller GA operators of otherwise having to comply with Class D airspace, including the costs of equipment, time and administrative resources associated with mandatory flight planning.

AMG would welcome the opportunity to provide further information, as required, to support the provision of CASA's proposed Bankstown Airport Southeast VFR Corridor.

Kind regards,

Tom Smith
Chief Executive Officer
Aeria Management Group