

18 July 2025

William Reynolds
Project Manager – Western Sydney Airspace Project
Airservices Australia

Sent by email: stakeholder@airservicesaustralia.com
cc: john.graham@airservicesaustralia.com

Dear William,

Re: Submission to Airservices Australia Industry Briefing Paper and Industry Engagement Report

Aeria Management Group (AMG), operator of Bankstown Airport and Camden Airport, welcomes the opportunity to respond to Airservices Australia's *Western Sydney International Airport Detailed Airspace and Flight Path Design Industry Briefing Paper* and *Changes to General Aviation Operations in the Sydney Basin Industry Engagement Report*, both dated June 2025.

AMG's position in respect of the significant operational and economic impacts of airspace and flight path changes related to Western Sydney International Airport (WSI), is detailed in our previous submissions to the:

- Aviation State Engagement Forum on "Proposed changes to general aviation operations in the Sydney Basin in support of the new Western Sydney International (Nancy-Bird Walton) Airport" (<https://aeria.co/wp-content/uploads/2025/07/240131-AMG-submission-to-AvSEF-on-proposed-changes-to-general-aviation-operations-in-the-Sydney-Basin-1.pdf>)
- Draft Environmental Impact Statement (EIS) for WSI (<https://aeria.co/wp-content/uploads/2024/02/240131-AMG-submission-to-Western-Sydney-International-Airport-Draft-EIS.pdf>).

In short, the airspace and flight path design to facilitate WSI will come at the expense of general aviation operations and services across Greater Sydney. As stated in the EIS for WSI: "Bankstown Airport is the most affected of all Sydney Basin airports by the proposed introduction of WSI operations."

The greatest cost will be to flight training at Bankstown Airport, the number one flight training base in New South Wales, supporting more than 600 new students a year.

Amid a global sustained shortage of aviation professionals, the loss of viable flight training areas in Greater Sydney will threaten Bankstown Airport's critical role in supplying pilots to meet the travel needs of all Australians.

As detailed in AMG's previous submissions, impacts on flight schools and students at Bankstown Airport include:

- Increased safety risks and hazards, particularly for inexperienced students navigating increasingly complex and congested airspace

- Increased flight time and costs to access alternative training areas
- Increased student fees
- Increased qualification and employment timelines for students
- Increased school staffing costs due to changes to training programs
- Increased compliance costs
- Reduced training capacity.

Such costs will force some flight schools at Bankstown Airport to downsize, relocate or close altogether. AMG's previous submissions quantified the toll on the airport's flight schools, including:

- Estimated economic cost of \$76 million in 2026, growing to \$102 million a year by 2055
- 20 per cent cut in student numbers, with flow-on impacts on key Australian sectors, such as aviation and tourism.

Such impacts are at odds with the Government's recent *Aviation White Paper – Towards 2050*, which affirms support for general aviation and the expansion of Australia's flight training industry, "to capitalise on growing global demand for pilots".

The reduced capacity or closing of flight schools at Bankstown Airport would, in turn, threaten the viability of aircraft maintenance businesses and other associated support businesses and their capacity to recruit and retain staff and future apprentices and trainees.

In addition to the above, impacts of the WSI airspace and flight path design on general aviation operations and services more broadly, include:

- Increased aircraft safety risks and hazards, including increased threat of midair collisions
- Increased airspace congestion and complexity
- Increased ground and airborne delays in ATC clearances, due to the greater number of IFR movements and related airspace complexity and congestion
- Increased aircraft fuel emissions
- Increased compliance costs.

Proposed lowering of Class C Airspace vertical lower limit

Separately, the proposed amendment of the Class C Airspace vertical lower limit from 2500ft to 1500ft in the Sydney Basin will have the following negative impacts:

- Increased aircraft congestion
- Increased incursions into controlled airspace, particularly given the relative inexperience of student pilots
- Increased safety risks and hazards
- Increased constraints on movements of VFR general aviation aircraft.

Measures to minimise impacts on general aviation

We note the commitment in the EIS for WSI by the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (Department), to consult with AMG and operators across Bankstown Airport and Camden Airport, to "minimise the risks and economic costs" of airspace and flight path changes.

AMG's previous submissions include multiple recommendations to mitigate such risks and costs, including but not limited to:

- An airspace review of the Sydney Basin to ensure safe and equitable access and use for all aviation operators
- Government funding or investment incentives to support the expansion of general aviation operations at Camden Airport, in part to facilitate the relocation of some operators from Bankstown Airport.

In a meeting with AMG in June 2025, the Department declined such recommendations and was unwilling to propose any alternative measures to minimise risks and economic costs. The Department is yet to consult with operators at Bankstown Airport and Camden Airport on this matter.

Bankstown Airport Southeast VFR Corridor

We note that Airservices' Industry Engagement Report affirms industry support for the proposed Bankstown Airport Southeast VFR Corridor.

AMG reiterates its support for the CASA-led proposal to create a flight corridor southeast of the airport, which will:

- Reduce airspace risks associated with the constrained nature of the Bankstown control zone and sustained growth in air traffic in the region
- Provide better access to alternative flight training areas
- Provide more equitable and efficient airspace access for general aviation operators in the Sydney Basin.

We note that CASA is redesigning the corridor, in response to industry feedback. We are increasingly concerned that the proposed measure will not be in place in time for the commencement of WSI-related airspace and flight path changes in June 2025.

We look forward to prompt industry and community consultation on the redesign and the delivery of the corridor, to help reduce economic and operational impacts on operators at Bankstown Airport.

Proposed new flight training areas

We note the reference in Airservices' Industry Engagement Report to proposed new flight training areas in the Sydney Basin – to the south and north of Bankstown Airport – which were identified in the EIS for WSI.

AMG reiterates its support for viable flight training areas in the Sydney Basin, to help mitigate the economic and operational impacts of the WSI airspace and flight path design.

We look forward to ongoing discussions with CASA on this matter.

Aircraft noise impacts

As affirmed in the EIS for WSI, facilitated changes to airspace and flight paths at Bankstown Airport and Sydney Airport, to accommodate WSI, will increase aircraft noise exposure and concentration for many residents and communities across Greater Sydney.

This includes several suburbs around Bankstown Airport, which will experience increased frequency and concentration of overflight by aircraft. Facilitated changes to Bankstown Airport flight paths will result in some areas being overflowed for the first time.

AMG is concerned the Department and Airservices Australia have underestimated community concerns regarding the impacts of the facilitated changes. Community consultation to date has

focussed on aircraft noise directly related to WSI flight paths, rather than the impacts of facilitated changes.

We are also concerned about the potential flow-on effects on Bankstown Airport and Camden Airport, potentially including restrictions on airport operations and developments. Any such constraints would have detrimental impacts on essential general aviation services and broader economic and employment generation in Southwest Sydney.

Please contact me or AMG Senior Communications & Stakeholder Engagement Manager Peter Munro (via peter.munro@aeria.co) if you wish to discuss these matters further.

Yours faithfully,



Tom Smith
Chief Executive Officer
Aeria Management Group