



22 October 2024

Office of Airspace Regulation (OAR)  
Civil Aviation Safety Authority (CASA)  
Via email: [OAR@CASA.gov.au](mailto:OAR@CASA.gov.au)

**Re: Proposed Bankstown Airport Southeast VFR Corridor**

Dear OAR

On behalf of the Regional Aviation Association of Australia (RAAA) I would like to provide the following feedback on the proposed Bankstown Airport Southeast Visual Flight Rules (VFR) Corridor. The Regional Aviation Association of Australia (RAAA) is a not-for-profit organisation formed in 1980 to protect, represent and promote the combined interests of its regional aviation organisations across Australia.

Airline members include Alliance, Airnorth, Nexus, Rex, Skytrans, Sharp Airlines, Skippers, and Link Airways. Other members include airports, engineering and flight training companies, finance and insurance companies and government entities. RAAA's members operate successful and growing businesses providing employment and economic sustainability within regional and remote areas of Australia.

The RAAA has 125 members and directly employs over 10,000 people, many in regional areas. On an annual basis, the RAAA's Air Operator Certificate (AOC) members jointly turnover more than \$1.5 billion, carry well more than 2 million passengers and move over 23 million kilograms of freight. Our regional airport members also provide and manage critical infrastructure across Australia.

Specifically, we have several member organisations based at Bankstown airport including Basair Aviation College (Flight Training), AirMed and Air Link (Jet charter and aeromedical services), Pionair (charter and cargo), AMSL Aero (aerospace development) and Aeria Management Group (AMG) who own and operate both Bankstown and Camden airports.

As you know the airspace surrounding Bankstown Airport is also used by other flying schools, private business flights, charter, freight, recreational flights, and emergency services activities.

The constrained nature of the Bankstown control zone has been well recognised over many years. There continues to be sustained growth in air traffic in the Sydney region as well as congestion in the airspace to the north and west of Bankstown Airport where the current VFR exit and entry routes are located.

The RAAA acknowledges that CASA and Airservices Australia have been working on a practical and safe solution and that the airspace change proposes:

- reclassifying a section of the Sydney CTR, located south and southeast of the Bankstown CTR, to create a Class G corridor from surface to 1,500 ft above mean sea level.
- the introduction of 2 one-way daytime-only VFR lanes within the proposed corridor.



The RAAA also understands that removing the constraints of the Sydney CTR will remove the clearance requirements to the airspace south of Bankstown Airport. The new lanes will be able to be used in addition to the existing north and west VFR routes.

However, the RAAA has concerns that the proposed altitude (surface to 1,500 ft above mean sea level) and the narrowing of the corridor near waypoints SPTM and CASO may have a negative impact on safe operations due to the potential high air traffic density and the types of pilots flying in that volume of airspace.

For example, there will be a large number of trainee and inexperienced pilots who will use the corridor. Careful consideration needs to be given to the mixed levels of flying experience and aptitude in being able to safely fly and navigate the proposed VFR corridor. Linked to this there may also be an increase in pilots breaching controlled (Class C) airspace inadvertently. This will dramatically increase the requirement on Air Services to manage the corridors. The challenge of navigating the corridor will further increase if there is any weather passing through.

There is also potential for increased ground congestion and delay at Bankstown airport. Any flow management into and out of the corridors by ATC will inevitably increase ground traffic. The flow on effect for this will be increased likelihood for cancelled flight operations, increased cost to flight training, and increased risk of ground events. Longer transit time to and from a suitable training area increases fuel usage and emissions.

Both CASA and Airservices also need to consider the potential for aircraft noise impacts from the focussing of flight paths into a narrow flight corridor. Obviously, this may impact operators' businesses and put unnecessary pressure on operators and the airport.

Some of our operators are also concerned that there may be impacts on their IFR operations both in and outside of tower hours. It has been their experience at other locations like Archerfield that IFR procedures can't be accessed outside tower hours. If this were to occur at Bankstown the proposed Sydney Basin airspace may have them being forced to operate via the VFR corridors. Mixing aircraft of different sizes and speeds in a narrow corridor is a serious safety concern.

The RAAA would respectfully request that CASA and Airservices provide assurance that IFR flight planned aircraft can access all the published arrival and departure procedures as appropriate and not be forced to use the proposed VFR corridors at any time of day or night.

Thank you for the opportunity to provide feedback. I am happy to discuss our feedback further if required.

Kind regards

A handwritten signature in black ink, appearing to read 'Rob Walker', is positioned above the typed name.

Mr Rob Walker  
Chief Executive Officer  
Regional Aviation Association of Australia