

By Email

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Dear Mr Kennedy,

AusALPA SUBMISSION TO ESSENDON FIELDS AIRPORT PRELIMINARY DRAFT MASTER PLAN 2019 CONSULTATION

The Australian Airline Pilots' Association (AusALPA) is the Member Association for Australia and a key member of the International Federation of Airline Pilot Associations (IFALPA) which represents over 100,000 pilots in 100 countries. We represent more than 7,500 professional pilots within Australia on safety and technical matters. Our membership places a very strong expectation of rational, risk and evidence-based safety behaviour on our government agencies and processes and we regard our participation in the work of the Australia's safety-related agencies as essential to ensuring that our policy makers get the best of independent safety and technical advice.

AusALPA welcomes the opportunity to comment on the Essendon Fields Airport Preliminary Draft Master Plan 2019 (pdMP).

AusALPA believes the pdMP is primarily a commercial development plan that sacrifices less-economic aviation activities for buildings and non-aviation use. It does not promote, protect or encourage aviation activities and will limit future aviation use of this federally owned public asset.

In our opinion, approval processes intended to protect the public interest have been manipulated, abused or ignored to promote non-aviation property uses at the expense of safety for aviation operations. Furthermore, the pdMP appears to be calculated to cause a further contraction of aviation operations, thus permitting even more property development. The original Bulla Road precinct DFO development, approved by the minister in 2004, infringed the runway strip width regulated by The Australian Government Rules and Practices for Aerodromes (RPA) and the Manual of Standards (MOS) — Part 139 Aerodromes (the MOS 139), as does the "Ifly" building currently under construction at the western edge near the threshold of runway 08 at 2 Burns St, Essendon Fields.

AusALPA believes that the pdMP will result in a serious safety margin reduction to aircraft operations at Essendon airport, will degrade aviation capability and infrastructure, and not be consistent with the Commonwealth Government's clear intentions to preserve the aviation infrastructure.

A serious safety margin reduction to aircraft operations at Essendon airport and a degradation in future aviation capability and infrastructure.

The vision stated on page 4 of the pdMP is twofold:

1. *To maintain a commercially viable, safe and functional general aviation facility which meets projected aviation requirements whilst,*
2. *Utilising the property's strategic land holdings for high quality commercial development.*

We contend that several aspects of the proposed commercial developments are contrary to the maintenance of a safe and functional general aviation airport.

The pdMP assumes and expects aviation activity to stabilise beyond the 20-year planning period (1.1) and uses this assumption to justify the further commercial land development within the airport. While aviation movements may naturally stabilise as expected, by limiting the facility for further expansion this assumption becomes a self-fulfilling prophesy. This could be contrary to the requirement of the Airport Lease stated in para 1.4 that;

"Throughout the term the lessee must develop the Airport site at its own cost and expense having regard to:

- a) *The actual and anticipated future growth in, and pattern of traffic demand for the Airport site;*
- b) *The quality standards reasonably expected of such an airport in Australia; and*
- c) *Good business practice."*

AusALPA understands that the broader expectations of the airport lessee include ongoing development of the airport, but that development of a national asset cannot be unfettered in the sole interest of the leaseholder.

The appropriateness of the development is one most properly examined through the lens of regulatory oversight – and the master planning process provides the means under the Airports Act 1996 (Cth) through which to accomplish this. The proposal to further develop the Bulla Road Precinct in the southwestern corner of the airport, which has been facilitated by the recent narrowing of the runway strip width from 300 metres to 180 metres and the proposal to reduce the runway width from 45 metres to 30 metres, is a serious reduction in the airport's aviation infrastructure and as such, reduces the margins of safety provided by the previous runway dimensions that prevented encroachment by the proposed development.

Section 4.3 of the pdMP identifies that the proposed 3rd runway at Melbourne Airport (Tullamarine) will necessitate an increased reliance upon the 08/26 runway at Essendon. This will further exacerbate an outcome where arriving and departing aircraft at Essendon will likely have to accept a greater crosswind component (up to 20 kts) than is currently the case. Crosswind is a well-documented factor in many runway excursions (refer to ATSB report AR2008-018 parts 1&2) and while Essendon does not currently have any jet Regular Public Transport operators utilising the airport, it is currently utilised by an increasing number of business aircraft of up to 50 tonnes maximum mass with wingspans exceeding 30 metres. Some of these aircraft are Code 4C under MOS 139.

Runway excursion is acknowledged by the US National Business Aircraft Association (NBAA) as accounting for approximately one third of the accidents involving Business Aircraft worldwide. While in most of these excursion events the consequences are relatively benign, there is an ever-increasing potential for injury and loss of life to result from a runway excursion as the runway dimensions and the aerodrome environment

becomes more restricted. It is for these reasons that ICAO and the CASA regulations outline minimum dimensions for the runway environment. As the NBAA says; *“Any Reduction of these margins has the potential to turn an expensive incident into a catastrophe!”*

The ATSB Report into Worldwide runway Excursions states;

“Fortunately, Australia has not experienced a runway excursion accident of the severity of those seen overseas. However, given the proximity of Australia’s major airports to urban residential and industrial areas, Australia is not immune. And;

It is important to recognise that the risk of a runway excursion accident is ever present and that a range of safety measures should be utilised by aircraft operators, and airport owners and managers to ensure the risk remains at an acceptable level.”

AusALPA strongly believes that Essendon Airport Pty Ltd is ignoring these risks. The combination of the proposals for a runway width reduction, the contraction of protected airspace and an increase in building encroachment increases these risks, identified by the ATSB, to an unacceptable level. The proposals within the pdMP are therefore contrary to the stated vision for the airport since the proposed changes are in fact reducing safety margins.

Not consistent with the Commonwealth Governments clear intentions to preserve the aviation infrastructure

On 10 August 2001, the then Deputy Prime Minister and Minister for Transport and Regional Services, the Hon John Anderson MP, and the then Minister for Finance and Administration, the Hon John Fahey MP, released a Joint Media Statement on the Sale of Essendon Airport that included two key statements:

Essendon Airport will continue to play a vital role in providing access to Melbourne for rural and regional Victoria, including as an airbase to a number of regional service providers such as the Air Ambulance and the Victorian Police Airwing.

And, most relevantly:

*...there can be no major development occurring on the airport site without the community being fully informed. **No radical changes to the runways will be countenanced.*** [emphasis added]

AusALPA maintains that the public was never fully informed of the consequences on safety standards of the approval for the DFO development on the ability of the airport to meet the applicable and emerging safety standards for runway strip widths, aided by CASA’s choice to abrogate their safety responsibilities during that particular Master Development Plan (MDP) approval process. However, the first condition of approval of the DFO MDP given by the Hon John Anderson MP in his communication of 16th December 2004 (Ref 2004080583) reiterated the Government’s intention to preserve the national aviation asset at Essendon:

“There must be no adverse impact from the proposed development on any navigation aids or operational activities at the airport”

While there remains an ongoing obligation on the airport lessee to develop the airport site to a quality standard reasonably expected of such an airport in Australia, this cannot be to the detriment of safety margins elsewhere preserved in legislation or other legal obligations to not depart from safety standards.

Adding constraints for future aviation activity to preference future non-aviation development is a retrograde change to existing infrastructure that disregards CASA Part 139 and MOS, guidance material, standards and regulations. This includes CASA Instrument 153/15 requiring a 300m Runway Strip Width (RSW).

In a recent letter to the AFAP dated 04 January 2018, CASA states:

“After discussions with the operator of Essendon Fields Airport, CASA assessed the existing obstacles within the Obstacle Limitation Surface of the revised runway strip. After consideration of a safety case provided by the aerodrome operator, this outcome was facilitated via a legislative instrument which is intended to prohibit the introduction of further obstacles. The assessment also included input from the certified instrument procedure.”

Disregarding the existence and intent of the Instrument, the pdMP states:

“The current runway strip widths are free of obstacles (other than frangible Navaids) to 150 metres for Runway 17/35 and 180 metres for Runway 08/26. An increase in the obstacle free runway strip widths is not practicable.” [emphasis added, page 33]

We suggest that the airport lessee is conveniently overlooking that until 2 April 2019, the published runway strip width of Runway 08/26 was **300 metres**, albeit with several identified and marked (lighted) obstacles. 300 metres was the required RWS by the CASA and had been since 2015 pursuant to CASA Instrument number 153/15. The purpose of this Instrument was to control and regulate obstacles within the 300m strip width, not allow a reduction to 180m as has been actioned already by NOTAM and is confirmed in the pdMP at page 33, section 4.6.

In summary the proposal to narrow the runways and continued further commercial development in close proximity to the runways, particularly Runway 08/26, will reduce the Airports viability as an aviation precinct and more importantly significantly increase the risk to aircraft operators, passengers, tenants and customers of any commercial developments and to nearby residents and the general public.

Yours sincerely,



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