

20 December 2024

Submission to the Draft Australian Airspace Policy Statement 2025

Introduction

Essendon Airport Pty Ltd (**EAPL**) welcomes the opportunity to provide feedback on the proposed Australian Airspace Policy Statement (**AAPS**) 2025. As a vital general aviation hub in Melbourne's northwest, Essendon Fields Airport (**EFA**) supports more than 50,000 aircraft movements annually, supporting a diverse range of general aviation operations including emergency services, regional passenger transport, business aviation and aircraft Maintenance, Repair and Overhaul (**MRO**).

While we support the AAPS's focus on safety, efficiency and sustainability, we emphasise the need for policies that ensure airspace certainty and protect critical aviation functions, particularly for general aviation and emergency services.

We have identified five key areas requiring further consideration to ensure effective and equitable airspace management in line with the government's strategic objectives.

Key Points of Consideration

1. Airspace Uncertainty / Melbourne Airport Third Runway

The Melbourne Airport Third Runway (**M3R**) will fundamentally alter the Melbourne Basin's airspace, posing significant operational and safety challenges for EFA. The approval of M3R has introduced significant airspace uncertainty for EAPL. While the conditions of approval include the preparation of noise sharing and airspace concept plans, these measures are insufficient without detailed airspace design being mandated as a prerequisite to Major Development Plan (**MDP**) approvals.

EAPL strongly recommends that future policies require detailed airspace design to be completed before MDPs are approved for projects of significant airspace impact.

2. Enhancing Service Operations

EFA's proximity to Melbourne Airport necessitates a balanced approach to airspace management. EF urges additional focus on ensuring equitable access and operational efficiency for smaller airports that provide for general aviation like EFA.

EFA plays a critical role in Victoria's emergency response network, hosting state and national emergency service providers, including police, air ambulance and firefighting operations. These services rely on unobstructed airspace access to operate effectively under time sensitive conditions.



Policies must prioritise protections for such essential activities within the broader airspace modernisation framework that prevent off airport development activities infringing protected airspace and ensure emergency aircraft are always able to respond quickly and safely.

3. Futureproofing for Emerging Technologies

As aviation technology continues to evolve, including the rise of electric vertical take-off and landing (**eVTOL**) aircraft, drones and other unmanned aerial systems (**UAS**). The successful integration of these technologies requires a proactive and adaptive regulatory approach.

We recommend that the AAPS:

- Establish clear guidelines for incorporating new technologies into existing airspace frameworks.
- Include airports as key stakeholders in working groups dedicated to managing technological integration.
- Provide regulatory certainty for flight testing and operational trials of emerging technologies, ensuring they do not disrupt traditional general aviation activities or compromise safety.

4. Strengthening Protection of Airspace Regime

The current framework for airspace protection is insufficient, with overlapping jurisdictions and inconsistent enforcement undermining the ability of airports like EFA to safeguard their airspace under the current *Airports (Protection of Airspace) Regulations 1996*.

EAPL calls for a comprehensive, whole of government approach to airspace protection, including:

- Enhanced coordination between federal, state and local authorities to prevent encroachments on protected airspace.
- Clear and enforceable policies that prioritise aviation operations over conflicting land uses.
- Stronger mechanisms to address and resolve airspace intrusions caused by nearby developments and/or construction activities.

Clear and enforceable policies are needed to safeguard the operational integrity of airports, particularly in the face of competing land use and infrastructure development pressures which are not adequately identified in State Planning Schemes.

5. The Australian Future Airspace Framework (AFAF)

EAPL supports the development of the AFAF and emphasises the importance of including airport operators as key stakeholders in the planning process. The success of the AFAF will depend on meaningful collaboration between airports, air navigation service providers, airlines and government agencies to deliver a cohesive airspace strategy.



EAPL also highlights the importance of flexibility in the AFAP to accommodate future growth and operational requirements, particularly for airports like EFA that serve a diverse mix of general aviation users.

Conclusion

We believe that EFA's unique role within the general aviation sector, combined with its proximity to Melbourne Airport, underscores the need for tailored policy solutions that safeguard its operations and support its continued growth.

EAPL is committed to working collaboratively with the Australian Government and industry stakeholders to shape the future of airspace management. We welcome further engagement on the implementation of the AAPS and its implications for the aviation community.

Thank you for considering our feedback.

Regards

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