



Australian Government

Civil Aviation Safety Authority

AIR NAVIGATION, AIRSPACE AND AERODROMES BRANCH

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MAJOR PROJECTS – BURRAH PARK (SSD-70313465) STAGE 1 AND CONCEPT PLAN - CASA COMMENTS ON EIS SPECIFICALLY AVIATION SAFETY ASPECTS

CASA has reviewed the Aviation Safeguarding Assessment by Avlaw of 8 October 2024 and briefly reviewed the Wildlife Hazard Assessment by Eco Logical of 2 October 2024 for the Burrah Park Warehouses development. Appropriately, the Aviation Safeguarding Assessment is based on the National Airports Safeguarding Framework. CASA comments on the Aviation Safeguarding Assessment with respect to the relevant NASF Guideline are as follows:

Guideline A: Measures for Managing Impacts of Aircraft Noise

Avlaw covered noise issues at section 5.1. CASA has no regulatory responsibilities regarding aircraft noise and aircraft noise issues are a matter for the Planning Authority.

Guideline B: Managing the Risk of Building Generated Windshear and Turbulence at Airports

Avlaw Section 5.2. CASA agrees that there is no requirement for a CFD (or wind tunnel) wind shear assessment for the Stage 1 buildings. The Stage 1 buildings are outside the wind shear Assessment Trigger Area.

Guideline C: Managing the Risk of Wildlife Strikes in the Vicinity of Airports

Avlaw Section 5.3.

Also, Avlaw Section 5.3 refers to the Wildlife Hazard Assessment by Eco Logical.

Also: [CASA Advisory Circular \(AC\) 139-26\(0\)](#) - Wildlife Hazard Management at Aerodromes provides general advice.

The Wildlife Hazard Assessment by Eco Logical provides detailed advice and lists a range of mitigation measures (Sections 5 and 6). The Aviation Safeguarding Assessment, the NASF Guideline and the CASA Advisory Circular also provide general advice for monitoring and deterring.

Western Sydney International Airport is in the process of preparing its Wildlife Hazard Management Plan. WSI is the primary stakeholder and has much better situational awareness than CASA on local Wildlife Hazards.

Western Sydney International Airport is also the primary stakeholder in the Aerotropolis Aviation Wildlife Risk Framework (Draft AAWSF) and the State Environmental Planning Policy (Precincts - Western Sydney Parkland City) 2021.

CASA sponsors the Australian Aviation Wildlife Hazard Group. However, due to resourcing and expertise considerations, CASA is not in a position to review the Wildlife Hazard Assessment by Eco Logical in detail.

Guideline E: Managing the Risk of Distractions to Pilots from Lighting in the Vicinity of Airports

Avlaw Section 5.4. CASA agrees with the Avlaw Aviation Safeguarding Assessment. (The main aim is not to have security / street lights etc 'shining upwards' and not to have green or red or white arrays of lights that could be confused with threshold or runway end or runway side lights respectively.) CASA is prepared to assess solar panels or shiny roofs or lighting plans if requested.

Guideline F: Managing the Risk of Intrusions into the Protected Airspace of Airports

Avlaw Section 5.5. CASA agrees with the Avlaw Aviation Safeguarding Assessment.

However, it should be noted that:

'The International Civil Aviation Organisation (ICAO) is established by the Convention on International Civil Aviation made in Chicago on 7 December 1944. On 1 March 1947, Australia ratified the Convention, thereby becoming a member of ICAO. The Chicago Convention is an approved schedule of the Air Navigation Act 1920.

Following are extracts from ICAO Annex 14 Volume 1 'Aerodrome Design and Operations':

4.2.19 New objects or extensions of existing objects shall not be permitted above an approach surface or a transitional surface except when, in the opinion of the appropriate authority, the new object or extension would be shielded by an existing immovable object.

'4.2.25 New objects or extensions of existing objects shall not be permitted above a take-off climb surface except when, in the opinion of the appropriate authority, the new object or extension would be shielded by an existing immovable object.'

Also, cranes that infringe PANS-OPS surfaces for more than 3 months (or less than 3 months without suitable mitigation) would present an unacceptable risk to the safety of air transport operations

If cranes infringe the Inner Horizontal Surface, and not PANS-OPS, it is likely that they would be approved, (with mitigation).

Also, as there will be no high output turbine power generators, exhaust plumes are very unlikely to be an issue.

CASA is prepared to assess objects (such as buildings and cranes) and plumes as requested. CASA notes the comment by Avlaw: "particularly in the south-eastern corner of the site: under section '4.4 Crane Activity'. Developments in the south-eastern corner will also require detailed analysis.

Guideline G: Protecting Aviation Facilities — Communications, Navigation and Surveillance (CNS)

Avlaw Section 5.6. Airservices Australia would review any proposed communication facilities that could affect aviation related communications/navigation. And whether the proposal effects CNS.

Guideline H: Protecting Strategically Important Helicopter Landing Sites

Avlaw Section 5.7. CASA agrees with Avlaw. There are no hospital Helicopter Landing Sites in the vicinity.

Guideline I - Managing the Risk in Public Safety Areas At The Ends Of Runways

The stage 1 development is clear of a hypothetical Public Safety Zone.

As concluded by Avlaw, *“Contour impacts Lots 2.7C and 2.8B. Positions of built structures within these lots and permitted land uses will be addressed through a detailed planning application and consultation with aviation stakeholders.”*

Guideline I is a Department of Infrastructure, Transport, Regional Development, Communications and the Arts initiative and is more relevant to Public Safety and appropriate development than Aviation Safety. It is recommended that the Department of Infrastructure is the primary stakeholder.

CASA has no major issues with the Avlaw Aviation Safeguarding Assessment or the Wildlife Hazard Assessment by Eco Logical, and no issues with the recommendations provided in the Assessments.

CASA does not object to the concept plan for Burrah Park and the development of stage 1 provided the mitigations described, are implemented.

Yours sincerely

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