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Avalon Airspace Review

December 2019

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safe skies for all

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1 Executive Summary

The *Airspace Act 2007* (Act) provides the Civil Aviation Safety Authority (CASA) with authority to administer and regulate Australian-administered airspace and authorises CASA to undertake regular reviews of existing airspace arrangements. The Office of Airspace Regulation (OAR) has conducted an airspace review within a 15 nautical mile (NM) radius of Avalon Airport to determine if the airspace remains fit for purpose. The review examined the airspace architecture, classifications, procedures and infrastructure from the surface to 8,500 feet (FT) above mean sea level (AMSL). The previous aeronautical study specifically for Avalon was conducted in 2008.¹

This airspace review applies CASA's regulatory philosophy which considers the primacy of air safety, whilst taking into account the environment, security, cost and is consistent with the Australian Airspace Policy Statement 2018 and the Minister's Statement of Expectations.

A multifaceted approach was used in conducting this review, including quantitative and qualitative analysis consisting of:

- Aerodrome traffic data;
- Airspace design;
- Australian Transport Safety Bureau (ATSB) incident data; and
- Stakeholder consultation.

1.1 Summary of Conclusions

The review found:

- Changing the airspace classification around Avalon during tower hours would enhance aviation safety.
- The air traffic control (ATC) services at Avalon are consistent with services provided at other locations where a Class C Control Zone (CTR) has been established.
- Avalon is within Primary Surveillance Radar coverage from Melbourne and access to the surveillance information by Avalon ATC staff will enhance the safety and efficiency of airspace use around Avalon.
- Performance based navigation (PBN) airspace design should be implemented.
- Ambiguities between the Designated Airspace Handbook (DAH) information and the actual Class E airspace at Avalon.
- Published instrument flight procedures at Avalon are not compliant with the International Civil Aviation Organization Doc 8168 Procedures for Air Navigation Services – Aircraft Operations (PANS-OPS).

1.2 Recommendations

The following recommendations are made:

Recommendation 1 Airservices Australia should review the airspace design and submit to CASA an Airspace Change Proposal to remove the Class E airspace in accordance with the report's findings and to ensure the airspace classification aligns with the appropriate level of air traffic service at Avalon.

Recommendation 2 Airservices should review and implement changes to Avalon airspace architecture based on PBN criteria.

Recommendation 3 Airservices should review the DAH and submit amendments to remove inconsistencies with other published aeronautical information for Avalon.

Recommendation 4 Airservices should review published aeronautical navigation charts and identify any discrepancies between information published in DAH and other aeronautical publications.

Recommendation 5 Airservices is to ensure published instrument approach and landing procedures for Avalon are compliant with ICAO PANS-OPS.

¹ Aeronautical Study of Avalon – May 2008; Office of Airspace Regulation Canberra 2008
Avalon Airspace Review – 2019

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2 Introduction

The Office of Airspace Regulation (OAR) within the Civil Aviation Safety Authority (CASA) has conducted an airspace review within fifteen (15) nautical mile (NM) radius of Avalon Airport (Avalon)² to determine if the airspace is still fit for purpose. The review examined the airspace architecture, classifications, procedures and infrastructure from the surface to 8,500 feet (FT) above mean sea level (AMSL).

The OAR is responsible for the regulation to administer and regulate Australian-administered airspace, in accordance with section 11 of the *Airspace Act 2007* (Act). Section 12 of the Act requires CASA to foster both the efficient use of Australian-administered airspace and equitable access to that airspace for all users. It requires that CASA must consider the capacity of Australian-administered airspace to accommodate changes to its use and national security. In exercising its powers and performing its functions, CASA must regard the safety of air navigation as the most important consideration.³

Section 3 of the Act states that ‘the object of this Act is to ensure that Australian-administered airspace is administered and used safely, taking into account the following matters:

- a. protection of the environment;
- b. efficient use of that airspace;
- c. equitable access to that airspace for all users of that airspace;
- d. national security.’

2.1 Overview of Australian Airspace

Australian airspace classifications accord with Annex 11 of the International Civil Aviation Organization (ICAO) and are described in the Australian Airspace Policy Statement 2018 (AAPS). Airspace is classified as Class A, C, D, E and G depending on the level of Air Traffic Service (ATS) required to best manage the traffic safely and effectively. Government policy allows the use of Class B and Class F airspace, however these are not currently utilised in Australia. The airspace classification determines the category of flights permitted, aircraft equipment requirements and the level of ATS provided. Annex B provides details of the classes of airspace used in Australia. Within this classification system aerodromes are either controlled, i.e. Class C or Class D or non-controlled airspace, i.e. Class G.

2.2 Purpose and Scope

The purpose of this review was to ensure that the airspace architecture and classification remains appropriate for the operations within the area.

The scope of this Avalon Airspace Review includes:

- assessment of risks to airspace users in the airspace within 15 NM of Avalon aerodrome from surface to 8,500 FT AMSL;
- consultation with stakeholders to obtain information related to airspace issues around Avalon aerodrome;
- an assessment of air routes and procedures to ensure they are efficient and fit for purpose;⁴ and
- analysis of any risks that may affect the safety of airspace users to determine the need for any changes to existing airspace architecture, services or procedures.

The scope of the review did not include aircraft operations above 8,500 FT AMSL, aerodrome facilities or developments and surrounding infrastructure, unless a significant safety issue related the airspace operations is found.

Airspace related matters that occur outside the review area may be included, subject to the discretion of the OAR.

² A full list of acronyms and abbreviations used in this report can be found in Annex A.

³ Civil Aviation Act 1988, section 9A – Performance of Functions

⁴ The term ‘fit for purpose’ means the product or service is satisfactory for the purpose it was designed or created for.

2.3 Objective

The objective of this review was to examine:

- the nature of aviation activity around Avalon;
- feedback from airport operators and airspace users;
- potential risks to the safety of passenger transport operations (PTO);
- any concerns about equitable access to the airspace by any airspace users;
- the appropriateness of the airspace architecture (includes classification);
- the services and facilities provided by the air navigation service provider (ANSP); and
- surveillance coverage and communication coverage in the review area.

2.4 Background

Avalon airport has undergone significant changes to its operations over the last 15 years. Avalon was a maintenance base for medium to heavy jet aircraft as well as military aircraft, including fighters and helicopters. Circuit and instrument approach training in Boeing's 737, 767 and 747 aircraft no longer occur. Avalon is capable of accepting Airbus A380 (A380) aircraft however, it remains only as an alternate for A380 aircraft planned for Melbourne.

Passenger and aircraft movements declined significantly during the last 15 years, Avalon changed in 2010 with the establishment to include a Class D control zone (CTR) with Class E airspace above the CTR

Avalon airspace was reviewed in 2010 as part of the Melbourne basin aeronautical study.⁵

In 2013 the Australian Transport Safety Bureau (ATSB) published a report that involved a loss of separation incident that occurred at Avalon between a landing Airbus A320 which conducted a missed approach and a departing helicopter. That report included a comment that different classes of airspace at Avalon generated complexity for airspace users.

Analysis of statistical information at Avalon shows that between March 2014 to March 2019, air transport movements and passenger movements increased by 79% and 96% respectively. Passenger numbers exceeded 990,000 for the 12-month period to March 2019.

In December 2018, Air Asia X commenced international operations at Avalon and forecast passenger movements are expected to exceed 1,000,000 during 2019. There is a reasonable expectation that the infrastructure created at Avalon will result in expansion of domestic and international operations at the aerodrome.

⁵ Aeronautical Study of Melbourne, Office of Airspace Regulation, Canberra 2011.

3 Aerodromes

Avalon is the largest aerodrome located in the review area. Point Cook aerodrome (Point Cook) is a military aerodrome where the Royal Australian Air Force (RAAF) Museum operates historic aircraft and the Royal Melbourne Institute of Technology University (RMIT) conducts flight training. Avalon and Point Cook are the only locations where terminal instrument flight procedures (TIFPs) are available. Uncertified aerodromes located in the review area include:

- Barwon Heads;
- Ceres;
- Little River;
- Drysdale;
- St Leonards; and
- Woolloomanata.

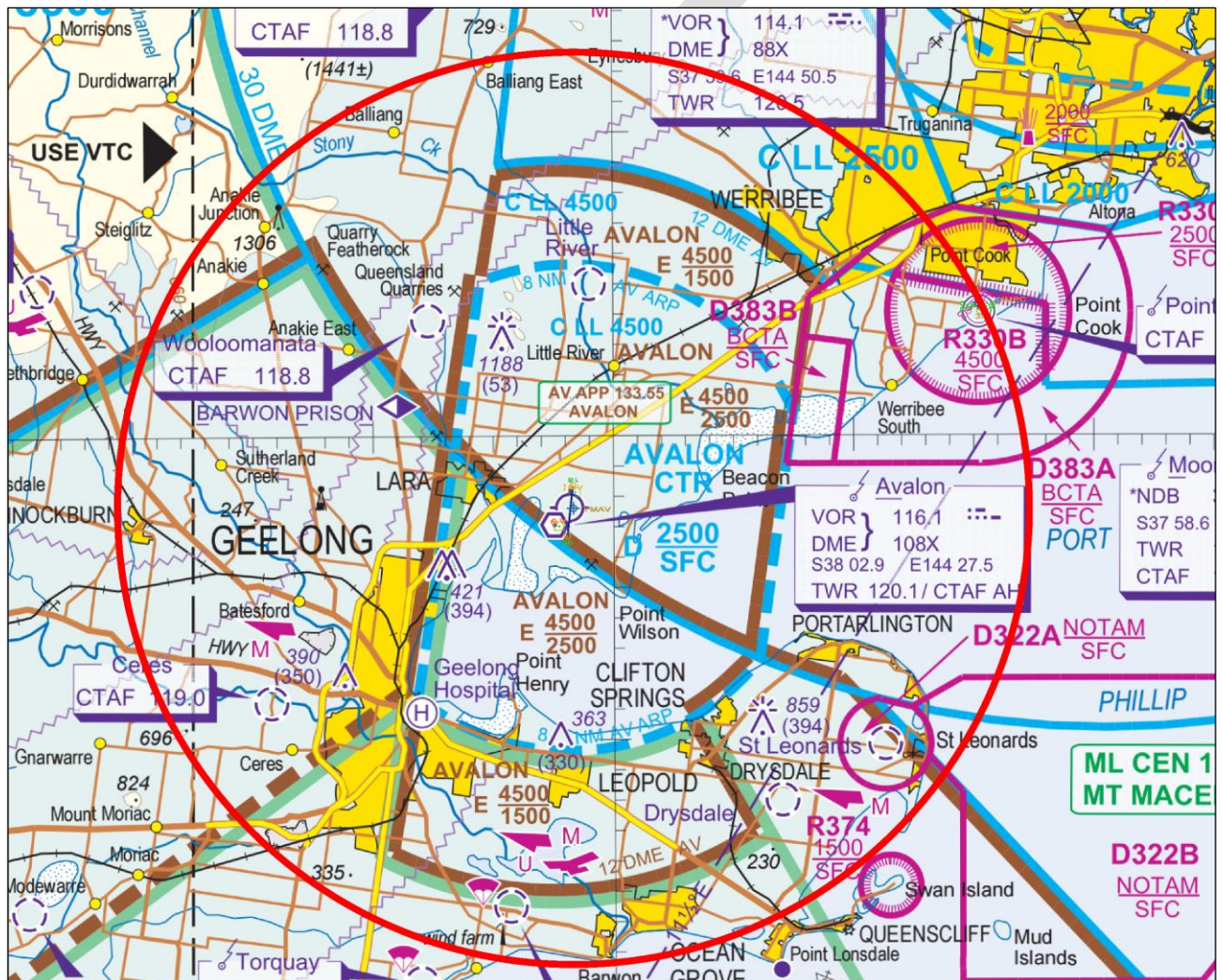


Figure 1: 15 NM Avalon airspace review area⁶

3.1 Avalon

Avalon is a certified aerodrome operated by Avalon Airport Australia Pty Ltd. In 1997 the Linfox Group acquired a 50-year lease agreement with an option to extend for a further 49 years from the Department of Defence. Annual passenger numbers at Avalon currently exceed 926,000 and is projected to increase beyond 1 million by the end of 2019. This is primarily due to the opening of the Avalon international terminal that became operational in December 2018. Other developments in the availability of transport options including rental

⁶ Source: Visual Navigation Chart (VNC) – Melbourne, Airservices Australia, effective 8 November 2018.

cars, taxis, other ride sharing options and Skybus have enabled increased passenger access to the airport.

Jetstar is the main domestic airline at Avalon with flights servicing Sydney, Gold Coast and Adelaide. In December 2018, Air Asia X commenced operations at Avalon with 2 flights daily to/from Kuala Lumpur using an Airbus A330 (A330).

Avalon has no facilities to support general aviation (GA). However, the airport and surrounding airspace is popular for flying training activity. This training extends from initial pilot training to pilots renewing endorsements or qualifications. All aircraft planning practice instrument approaches at Avalon are required to obtain ATC approval via the Airwork Online Booking System.⁷

International freight operations at Avalon increased from approximately 20 to 49 movements between 2008 to 2018. These international freight flights were for special events such as Formula 1 Grand Prix, V8 Supercars, Moto GP, Melbourne Cup (horses) and concerts and usually involved Boeing 747 (B747) aircraft. Increased international freight movements occur in March and October which coincides with the major motor sport events.⁸

Prior permission is required (PPR) for all non-training flights and operators wanting to nominate Avalon as an alternate. Avalon is capable of supporting A380 aircraft but no A380 operations are currently planned for Avalon.

Every two years for approximately ten (10) days between February and March, Avalon hosts the Avalon International Airshow (the airshow). This event attracts a large variety of domestic aircraft and Australian and foreign military aircraft. During the airshow a temporary restricted area (TRA) is established to ensure the safety of all airspace users.

Avalon aerodrome facilities

Avalon has an aerodrome elevation of 35 FT and one designated sealed runway 18/36 (RWY18/36) which has the following characteristics:

- Runway threshold elevation 32 FT AMSL (RWY18) and 34 FT AMSL (RWY36);
- Runway length is 3,048 metres (m);
- Runway width of 45m; and
- 300m runway strip width (RWS) (Graded 150m and gable markers at 150m).

Avalon nav aids include Distance Measuring Equipment (DME), Very High Frequency Omnidirectional Range (VOR) and an Instrument Landing System (ILS).

Aviation Rescue Fire Fighting (ARFF) service is available and the category of service is determined by the largest aircraft serving an airport. A Notice to Airmen (NOTAM) advising a Category 8 ARFF service is present during periods when the A330 aircraft is arriving or departing and a Category 6 service during other times at Avalon.⁹

Avalon has an air traffic control (ATC) tower. The tower is active daily from 0700 hours (local) and due to commencement of operations by Air Asia X, tower hours have been extended from 2000 hours to 2300 hours (local).¹⁰ A Common Traffic Advisory Frequency (CTAF) and Aerodrome Frequency Response Unit (AFRU) operate outside tower hours. Further details Tower operations and controlled airspace are located within Chapter 0 of this review.

The following diagram shows the runway and facilities at Avalon.

⁷ Airservices online booking system – Appendix 2

⁸ Source: Avalon Airport Australia Pty Ltd

⁹ An explanation of the ARFF levels of service is available from Airservices Australia website

<http://www.airservicesaustralia.com/services/about-our-aviation-fire-service/arff-levels-of-service/>

¹⁰ All times in this review are shown as Coordinated Universal Time (UTC) unless otherwise specified.

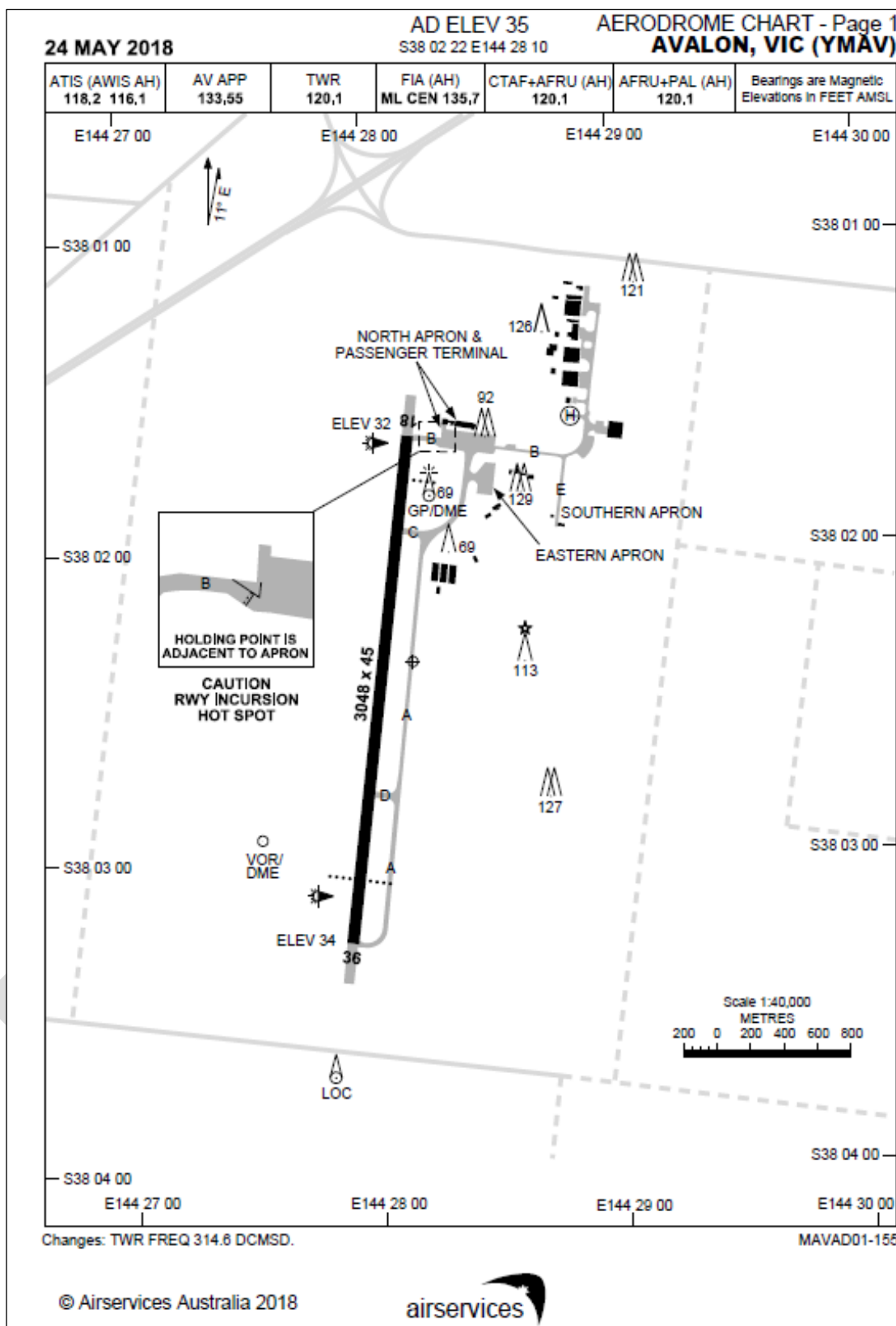


Figure 2: Avalon aerodrome chart¹¹

¹¹ Source: Aeronautical Information Publication (AIP) Departure and Approach Procedures (DAP) amendment 157 effective 8 November 2018, Airservices Australia

3.2 Point Cook

Point Cook Airport (Point Cook) is a military aerodrome operated by the RAAF. Military aerodromes are not bound by the Civil Aviation Regulations 1988 and therefore are not defined as certified or registered aerodrome nor as an aircraft landing area. Military airfields may permit or enable civilian aviation operations to be undertaken at these locations.

The RAAF Museum is housed at Point Cook and pays homage to the RAAF history with hangarage and aircraft displays of significance to the RAAF. The restricted areas around Point Cook (R330A and R330B) allow for some display aircraft to be flown over the airfield each Tuesday, Thursday and Sunday at 1300 hours (local).

Point Cook has a number of additional military flights operating to and from the airfield. Military movement numbers are expected to increase in 2019 due to an increase of flying training at East Sale and support of their operations. Also, Point Cook experiences increased traffic movements due to the proximity of Avalon during the Avalon International Airshow every 2 years.

In relation to civilian aviation activity, RMIT conducts flight training at Point Cook. Training numbers in 2018 increased by 17% from the previous year. It is estimated that this will increase again by another 25% in 2019 with the first semester fully booked and the second semester having 48 confirmed trainees (at the time of consultation).¹²

Gliding operations are conducted at Point Cook. The aerodrome has self-launching gliding operations during the day (sunrise to sunset). When gliding operations are in progress, a glider flying ground signal is displayed on the ground signals area adjacent to the RWY17 illuminated wind indicator (IWI).

Due to the intensive flying training (RMIT), gliding operations and military or museum aircraft activity flight procedures and special procedures have been established for Point Cook. These special procedures are detailed in the En Route Supplement of Australia (ERSA). This includes the provision that all aircraft transiting Point Cook should, weather permitting, “*be no lower than 2,000 FT.*”

Prior permission is required for all visiting civilian and military aircraft to use Point Cook. Notice must be given at least 24 hours before arrival during Monday to Friday and at least 48 hours for weekend movements.

Point Cook aerodrome facilities

Point Cook has an aerodrome elevation of 14 FT AMSL (4.27m) and three runways designated 17/35 (sealed), 04/22 (sealed) and 08/26 (grass). The following characteristics apply to each runway.

RWY 17/35

- Runway threshold elevation of 13 FT AMSL (RWY17) and 8 FT AMSL (RWY35);
- Runway length of 1,374m;
- Runway width of 45m; and
- 135m runway strip width.

RWY 04/22

- Runway threshold elevation of 9 FT AMSL for each runway;
- Runway length of 1,137m;
- Runway width of 45m;
- 135m runway strip width.

RWY 08/26

- Runway threshold elevation for either end are not recorded for this grass runway;
- Runway length of 1,066m;
- Runway width of 45m; and
- 135m runway strip width.

¹² Information supplied by RMIT Flight Training

Other grassed areas are able to be used for other aviation activities such as gliding and are indicated on the published aerodrome chart. The following diagrams identify the glider flying training area and aerodrome facilities at Point Cook.

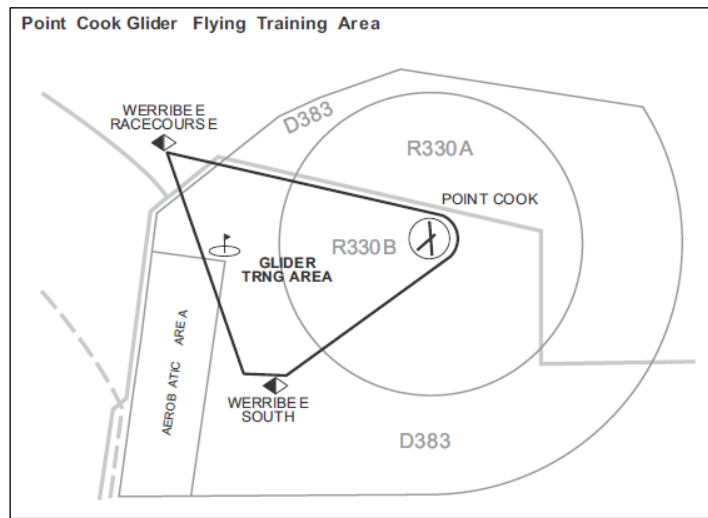


Figure 3: Point Cook Glider Flying Training Area¹³

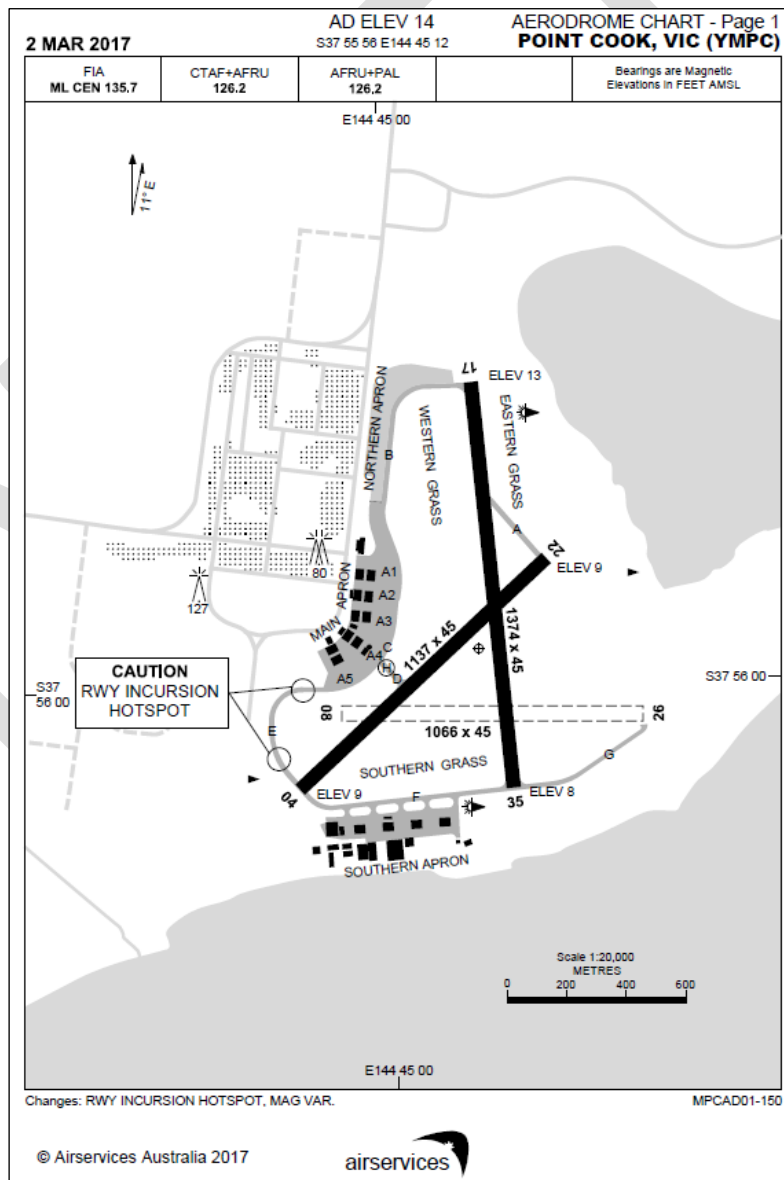


Figure 4: Point Cook aerodrome chart¹⁴

¹³ Source: En Route Supplement Australia effective 8 November 2018, Airservices Australia

¹⁴ Source: AIP DAP amendment 157 effective 8 November 2018, Airservices Australia

3.3 Barwon Heads

Barwon Heads Airport (Barwon Heads) is an aircraft landing area (ALA) operated by the Geelong Surfcoast Airpark and has been in continuous use for 54 years. The airfield is specifically for light aircraft and prior permission is required before using the airport.

Barwon Heads has a mix of commercial and private operations at the airfield including Skydive Australia with approximately 10,000 parachute descents during 2018, mostly from 14,000 FT AMSL. Geelong Helicopters who operate three R44 helicopters had approximately 4,000 tourist flights between Geelong waterfront and Barwon Heads in 2018. Adventure Flight Co conduct warbird aerobatic flights, charter flights to King Island and Twelve Apostles and other local scenic and business flights, are also users of the airfield.

Barwon Heads is an important departure and arrival point for Bass Strait aircraft and is located outside the Class E 12 DME step south of Avalon. The lower limit (LL) of Class E airspace in this area is 18,000 FT AMSL (Flight Level 180 (FL180)).

Yearly approximately 40,000 people attend Barwon Heads to fly, parachute, travel or watch others undertake activities at this location.

Barwon Heads has two runways: RWY18/36, an unrated sealed runway approximately 750 m long and RWY 09/27, a grass strip runway approximately 520m long.

Barwon Heads CTAF is 119.0 MHz.



Figure 5: Barwon Heads ALA¹⁵

¹⁵ Google Earth V 7.3.1.4507 (6 February 2018) Barwon Heads, Victoria. 38° 15' 29.60" S 144° 25' 38.55" E, Eye Alt 3.00km. DigitalGlobe 2018. <http://www.earth.google.com> [9 January 2019]

3.4 Ceres

Ceres is an ALA, privately operated, located 11.6 NM south west of Avalon.

Ceres is located within Class G airspace, outside the Avalon Control Zone (CTR) and Class E steps. Prior permission is required for operating at Ceres. At Ceres, the lower limit of Class E airspace is FL180.

Ceres has one unmarked, unsealed, dirt and grass runway RWY18/36 which is approximately 850m long. Ceres is used by light aircraft and helicopters.

Ceres CTAF is 119.0 MHz.



Figure 6: Ceres ALA¹⁶

3.5 Little River

Little River ALA (Little River) is privately owned and located approximately 7.5 NM north of Avalon and approximately 0.5 NM inside the CTR. It is 2.5 NM north of the Little River township and 2.5 NM north-east of the You Yangs mountain range. Little River is positioned under the flight path for Avalon.

There are two unmarked natural surface runways, RWY16/34, approximately 725m in length and RWY09/27, approximately 900m in length. Ground communication at Little River with Melbourne Centre is limited and broken. Users at Little River do obtain clearances by telephone when radio communication is not effective.

Some runway medium intensity lighting has recently been installed at Little River and private aircraft movements occur on a regular basis. Total movement numbers are not recorded. There is no published aerodrome or facilities information in ERSA.

¹⁶ Google Earth V 7.3.1.4507 (6 February 2018 Ceres, Victoria. 38° 08' 48.75" S 144° 15' 33.15" E, Eye Alt 3.00km. DigitalGlobe 2018. <http://www.earth.google.com> [9 January 2019]

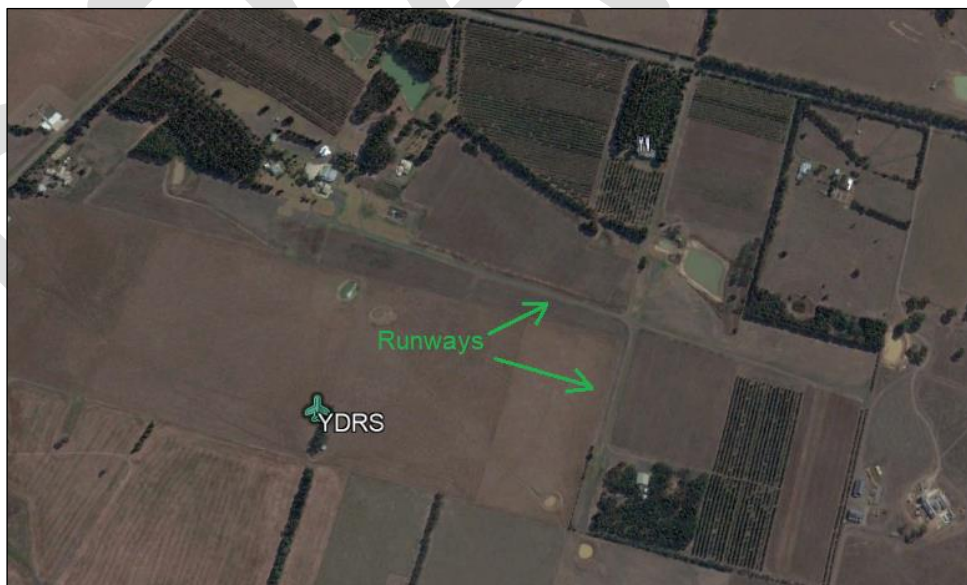
Figure 7: Little River ALA¹⁷

3.6 Drysdale

Drysdale ALA (Drysdale) is privately operated and located approximately 11.9 NM south east of Avalon.

There are two unmarked natural surface runways RWY09/27, approximately 900m in length and is the preferred runway to use and RWY18/36, which is approximately 435m in length.

Drysdale is utilised by light, sports aviation type aircraft. Movement numbers are not recorded or known. There is no published aerodrome and facilities information in ERSAs for Drysdale.

Figure 8: Drysdale ALA¹⁸

¹⁷ Google Earth V 7.3.1.4507 (6 February 2018) Little River, Victoria. 37° 55' 04.68" S 144° 28' 56.50" E, Eye Alt 3.00km. DigitalGlobe 2018. <http://www.earth.google.com> [9 January 2019]

¹⁸ Google Earth V 7.3.1.4507 (6 February 2018) Drysdale, Victoria. 38° 12' 00.36" S 144° 36' 59.86" E, Eye Alt 3.00km. DigitalGlobe 2018. <http://www.earth.google.com> [30 January 2019]

3.7 St Leonards

St Leonards ALA (St Leonards) is located approximately 13 NM south east of Avalon.

There are two unmarked natural surface runways RWY10/28, approximately 630m in length and RWY18/36, approximately 630m in length.

There is no published aerodrome and facilities information in ERSA for St Leonards.

St Leonards is utilised by light, sports aviation aircraft. The aerodrome is also used by Textron Systems Pty Ltd (Textron) for unmanned aerial vehicle (UAV) testing. Danger area D322A overlies St Leonards and has a 1.5 NM radius area based at St Leonards. This area is less than 1.5 NM to the north of the ALA where it borders the 30 DME Melbourne controlled airspace boundary.

East of D322A is D322B which overlies a large area in Port Phillip Bay. Textron is the contact for both areas which are used for UAV testing. Further information on Danger Areas are detailed in section 4.3.

Textron advised that UAV test flights conducted from St Leonards into D322A occur for a period of, on average, 1 week for each month. Most operations in D322A are conducted up to 4,500 FT AMSL. Textron has approval for operations up to 7,500 FT AMSL.



Figure 9: St Leonards ALA¹⁹

3.8 Woolloomanata

Woolloomanata ALA (Woolloomanata) is located 7 NM north west from Avalon, 2.5 NM west of the You Yangs and 6.2 NM west of Little River township.

Woolloomanata has three unmarked natural surface runways, RWY09/27 approximately 865m in length, RWY15/33 approximately 800m in length and RWY05/23 approximately 375m in length. There is no published aerodrome and facilities information in ERSA for Woolloomanata.

¹⁹ Google Earth V 7.3.1.4507 (6 February 2018) St Leonards, Victoria. 38° 10' 09.50" S 144° 41' 17.93" E, Eye Alt 3.00km. DigitalGlobe 2018. <http://www.earth.google.com> [9 January 2019]



Figure 10: Woolloomanata ALA²⁰

3.9 Terminal Instrument Flight Procedures (TIFP)

ICAO Doc 8168 Procedures for Air Navigation Services – Aircraft Operations (PANS-OPS) provides the standard which is used to design TIFPs in Australia. PANS-OPS surfaces are intended to safeguard an aircraft operating under Instrument Flight Rules (IFR) conditions from known and calculated obstacle heights. The design of TIFPs assumes normal operations and the surfaces created describe the critical areas and obstacle clearance requirements for the achievement of safe, regular instrument flight operations.

In Australia, the Civil Aviation Safety Regulations Part 173 (CASR Part 173) establishes the regulatory standards for designing TIFPs. The Manual of Standards Part 173 – Standards Applicable to Instrument Flight Procedure Design (MOS173) has additional design standards not included in PANS-OPS and are differences adopted by Australia.

PANS-OPS procedures are for reduced visibility weather conditions when a pilot is dependent upon and guided by the aircraft instruments for flying. The Obstacle Limitation Surface (OLS) is for aircraft operating under visual flight rules (VFR) within visual meteorological conditions (VMC).

Avalon and Point Cook are the only locations within the review area where TIFPs are promulgated.

²⁰ Google Earth V 7.3.1.4507 (6 February 2018) Little River, Victoria. 37° 56' 15.34" S 144° 22' 23.11" E, Eye Alt 3.00km. DigitalGlobe 2018. <http://www.earth.google.com> [9 January 2019]

Avalon TIFPs

The following points are noted regarding the Avalon TIFPs.

- The RNAV (GNSS) procedures are not compliant with PANS-OPS with regard to segment lengths required for minimum stabilisation distances. This does not mean the procedures are unsafe. There are no issues for aircraft arriving via AVVNE or AVVSB;
- All TIFPs are compliant with MOS173 except:
 - RNAV (GNSS) RWY 36 when Avalon is not active, aircraft may leave Class E into Class G and re-enter Class E during a missed approach;
 - RNAV (GNSS) RWY 36 initial approach fix AVVSA has less than 1 NM buffer from the Class E boundary;
 - RNAV (GNSS) RWY 36 holding at waypoint AVVSB is not contained within control area (CTA) steps;
 - RNAV (GNSS) RWY 18 holding at waypoint AVVNE is not contained within CTA steps;
 - VOR RWY 36 holding overhead the VOR is not contained within CTA;
 - VOR RWY 18 holding overhead the VOR is not contained within CTA and the reversal procedure does not have a sufficient lateral buffer; and
 - ILS-Y or LOC-Y RWY 18 reversal through and holding at TEMPL are not contained within CTA steps.
- The current airspace architecture does not fully contain the TIFPs. The airspace would need to be redesigned to address containment issues.
- The TIFPs are unable to be redesigned to assure compliance with MOS173. The airspace would need to be redesigned to address containment issues.

Required Navigation Performance – Authorisation Required (RNP-AR) instrument flight procedures are being designed for Avalon. These are proprietary procedures developed for aircraft within the Qantas Group i.e. these procedures will not be available for general public use. The proposed TIFPs must be designed within the current CTR dimensions ensuring containment.

The JAYBI STAR requires an aircraft to be vectored or receive tracking instructions for arrivals to RWY36. The STAR is appropriate for the RWY18 ILS or LOC procedures. There are no direct connections to the VOR or RNAV procedures from the STAR.

Aircraft planning practice instrument approaches are required to obtain ATC approval via the Online Airwork Booking System through the Network Coordination Centre (NCC) portal available on the Airservices website.²¹ This process ensures ATC are able to efficiently accommodate the planned practice flights in sequence with other airspace users.

Point Cook TIFP

The following points are noted regarding the Point Cook TIFP and published chart.

- R330A and R330B are not indicated in the plan view diagram;
- There is no indication of a crossing grass runway on the chart;
- There is no information pertaining to the availability of the procedure when R330A or R330B are active;
- Danger areas (DA) are not indicated in the plan view diagram. D383 Point Cook flying training area and D322A St Leonards unmanned aerial vehicle testing could be included to assist with situational awareness; and
- A note on the Moorabbin (YMMB) NBD-A chart states 'AV – MB track conflicts with Pt Cook RNAV APCH near 17AV.' This note is not reciprocated on the Point Cook TIFP chart.

The above issues have been forwarded to the relevant section within CASA, to review and address.

²¹ Airservices Australia Network Coordination Centre Portal (12 December 2018) <https://www.airservicesaustralia.com/noc/>. Viewed 21 January 2019.

3.10 Aeronautical Information

The review identified inconsistencies between promulgated aeronautical information publications (AIP) including charts and other aeronautical documents.

The Designated Airspace Handbook (DAH) details information pertinent to airspace including lateral and vertical limits, air routes, IFR waypoint names and positions and certified or registered aerodromes threshold data. With regard to the vertical limits, DAH provides *'Except when stated as above ground level (AGL), Lower and Upper vertical limits are promulgated as Above Mean Sea Level when at or below the Transition Altitude or as a flight level when above the Transition Altitude.'*²²

However, the section relating to Class E airspace in DAH has promulgated Avalon CTA E1 vertical limits from 700 – 1500. There is no indication that 700 (FT) refers to AGL. This is consistent with other DAH Class E airspace entries for locations such as Mackay and Rockhampton. Furthermore, Mackay and Rockhampton aeronautical charts indicate Class E LL 700 FT AGL.²³

An amendment proposal to change the Avalon airspace from Class E LL 700 FT AMSL to Class E LL 700 FT AGL occurred in 2011, but this change is not consistent throughout all aviation publications including maps, DAH and ERSA.

²² Designated Airspace Handbook Introduction, effective 8 November 2018, Airservices Australia

²³ Source: Mackay VTC, Mackay Terminal Area Chart (TAC), Rockhampton VTC, Rockhampton VNC, Rockhampton TAC effective 8 November 2018, Airservices Australia

4 Airspace

4.1 General

Avalon airspace architecture and ATC services were considered complex, confusing and nonstandard

The airspace in the review area includes varying levels of Class D, Class E and Class G airspace overlaid by Class C airspace. The Avalon airspace classifications are linked to the Avalon ATC Tower hours of operation. The airspace architecture should be simplified to avoid confusion and uncertainty by airspace users. .

When considering the impact of a complex airspace structure the ATSB report AO-2013-115 related to the loss of separation between an aircraft conducting an approach to Avalon and a helicopter departing Avalon on 04 July 2013²⁴ noted that the complexity of the airspace structure may have been a contributing factor to the incident. There has been no change to the airspace design since the finalisation of this report in October 2013. A proposal was presented to the Victorian RAPAC in November 2016 by Airservices Australia, however no further progress has been made since that presentation.

In 2018, Airservices Australia released details of an Airspace Modernisation Project that seeks to standardise the airspace architecture and ANSP services across Australia.

The airspace structure within 15 NM of Avalon is shown on Figure 1. Avalon airspace is created in a 'keyhole' design located adjacent to but separate from the Melbourne/Essendon airspace.. Aircraft are generally tracked into Avalon from the north using primary and secondary surveillance radar. Aircraft operating in the review area can be detected at or above 200 FT AGL.

4.2 Airspace Structure

The review area airspace is described as follows:

The Avalon CTR is promulgated in a racetrack like shape with the northern and southern ends aligned with the 18/36 runway out to eight (8) NM from the Avalon aerodrome reference point (ARP). The CTR is approximately 11.5 NM in width. Class D airspace operates within the vertical limits from the surface to 2,500 FT AMSL and is indicated in the following diagram.

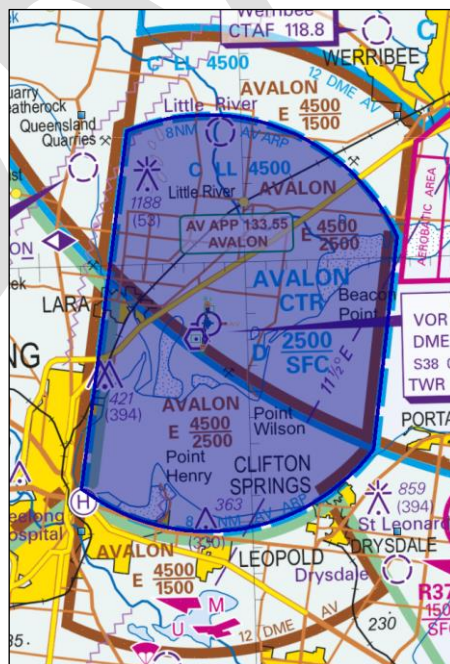


Figure 11: Avalon Class D CTR - surface to 2,500 FT AMSL²⁵

²⁴ Loss of separation between an Airbus A320, VH-VFJ and a Bell 412, VH-VAO; Australian Transport Safety Bureau, Canberra 2013.

²⁵ Source: VNC Melbourne, effective 8 November 2018, Airservices Australia

When the Avalon CTR is active, Class E airspace extends above the CTR from 2,500 FT AMSL to 4,500 FT AMSL. When the CTR is not active, the airspace is promulgated as Class E airspace from 700 FT AGL to 1,500 FT AMSL as identified in Figure 12. The airspace from the surface to 700 FT AGL is Class G airspace.

Extending beyond the CTR and within the airspace boundary inside the 12 Distance Measuring Equipment (DME) steps, Class E airspace extends from 1,500 FT AMSL to 4,500 FT AMSL (refer Figure 13). The airspace from the surface to 1,500 FT AMSL from the 12 DME step to 8 NM ARP is Class G.

Above Class E and within 30 DME of Melbourne airport (Melbourne), Class C airspace commences at 4,500 FT AMSL. Outside 30 DME Melbourne, there is no Class C airspace except for the area east of St Leonards, over Port Philip Bay where Class C operates from 8,500 FT AMSL. North of the 12 DME northern step Class C airspace with a LL of 2,500 FT AMSL extends to and beyond the 15 NM review area.

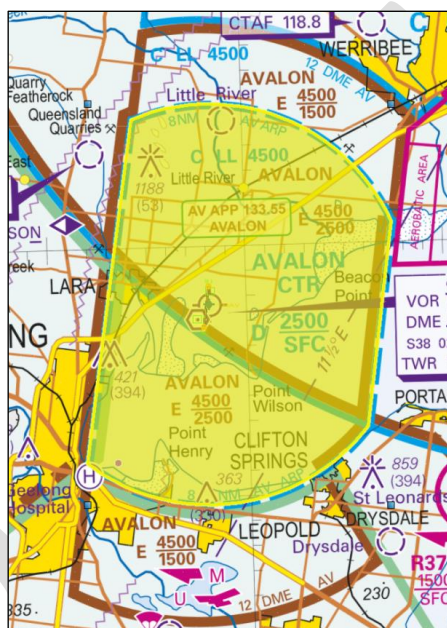


Figure 12: Avalon CTA E1 - 700 FT AGL to 1,500 FT AMSL²⁶



Figure 13: Avalon CTA E2 - 1,500 FT AMSL to 4,500 FT AMSL²⁷

²⁶ Source: VNC Melbourne, effective 8 November 2018; Airservices Australia

²⁷ Source: VNC Melbourne effective 8 November 2018, Airservices Australia

As detailed above, when the CTR is activated, Avalon airspace is a combination of Class D airspace and Class E airspace which is surrounded or overlaid by Class C airspace and Class G airspace.

The following profile diagrams illustrate the different classes of airspace and operational frequencies at Avalon.

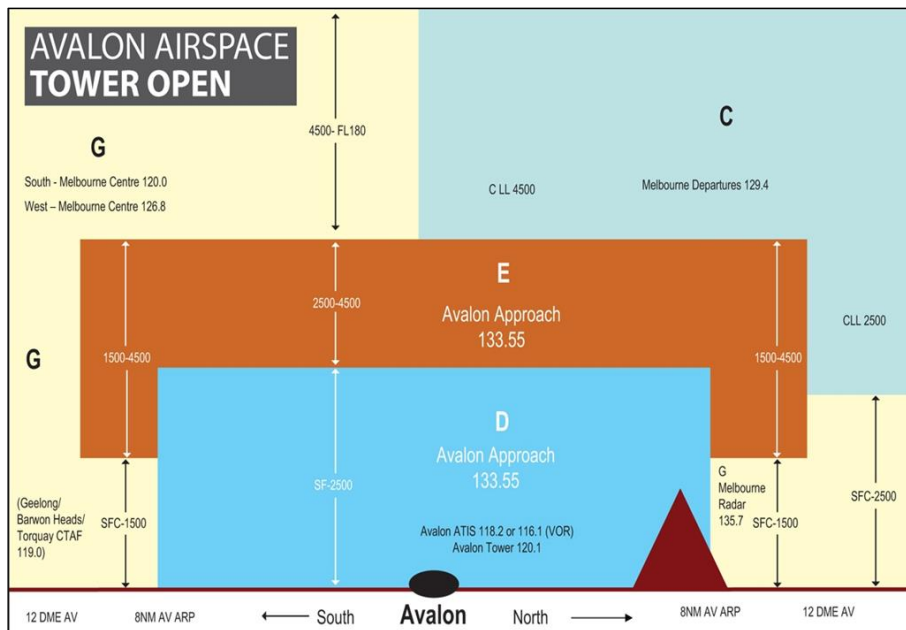


Figure 14: Side view Avalon airspace with Avalon Tower open²⁸

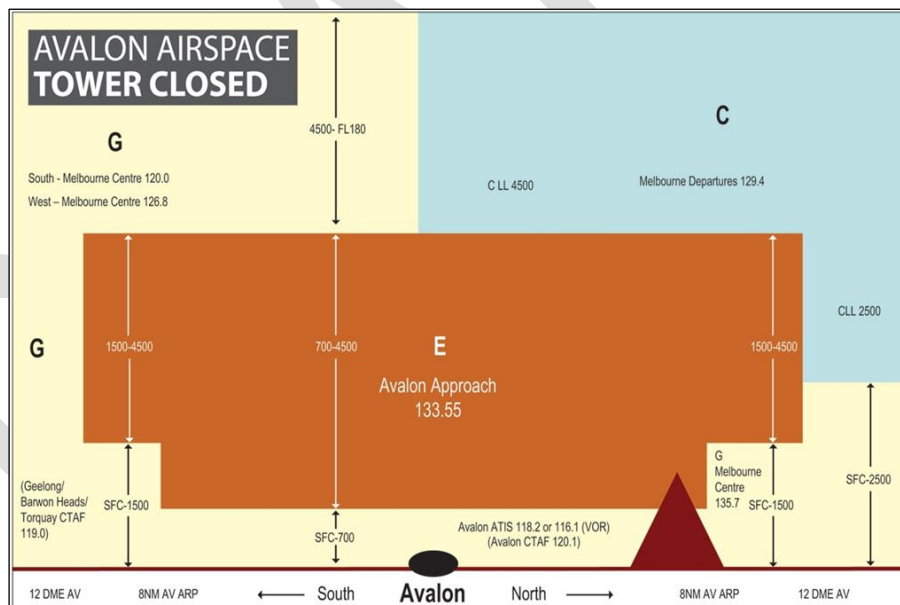


Figure 15: Side view Avalon airspace with Avalon Tower closed²⁹

4.3 Restricted and Danger Areas

The declaration and architecture for Restricted Areas (RA) and Danger Areas (DA) are in Annex C. The RAs and DAs located within the review area are identified in Figure 1 and Figure 16, and are described as follows:

R330A and R330B are located over and within 3 NM around Point Cook aerodrome. Respectively, each area is from the surface to 2,500 FT AMSL and surface to 4,500 FT AMSL (the LL of Class C airspace above each RA). The RAs are controlled by the Point Cook aerodrome operator. The hours of activity for each RA are Tuesday, Thursday, Sunday; 0315-0345 Coordinated Universal Time (UTC) (1 hour earlier during hours of

²⁸ Source: Avalon Airspace Tower Open Airservices Australia 2016

²⁹ Source: Avalon Airspace Tower Open Airservices Australia 2016

daylight saving (HDS)) or as amended by NOTAM. These areas have a RA3 conditional status meaning clearance through the RA by the controlling authority is not available except in a declared emergency.

D383A is located at Point Cook and promulgated as a flying training area. Contained within this area is D383B which is an aerobatic area that borders the Avalon CTR. The vertical limitation is from the surface to the base of controlled airspace (BCTA). D383A and D383B are operated by the Point Cook aerodrome operator. The hours of activity are promulgated between sunrise to sunset (HJ) or as amended by NOTAM.

R374 Swan Island is a 1 NM radius area around Swan Island. The area is from the surface to 1,500 FT AMSL. The RA is controlled by the Army Range Control Officer (RCO) Swan Island and is active 24 hours each day. This area has a conditional status of RA3.

D322A is 1.5 NM radius area over St Leonards ALA. D322A is bordered by the 30 DME arc from Melbourne. D322B is an area extending east from D322A and over Port Phillip Bay. The areas are promulgated for the purpose of unmanned aerial vehicle testing. The vertical limitation for each is from the surface to the NOTAM elevation. The hours of activity are via NOTAM. The contact is Textron Pty Ltd³⁰. D322B has been excluded from this review and will be included in a future review for the Moorabbin area and/or Melbourne basin.

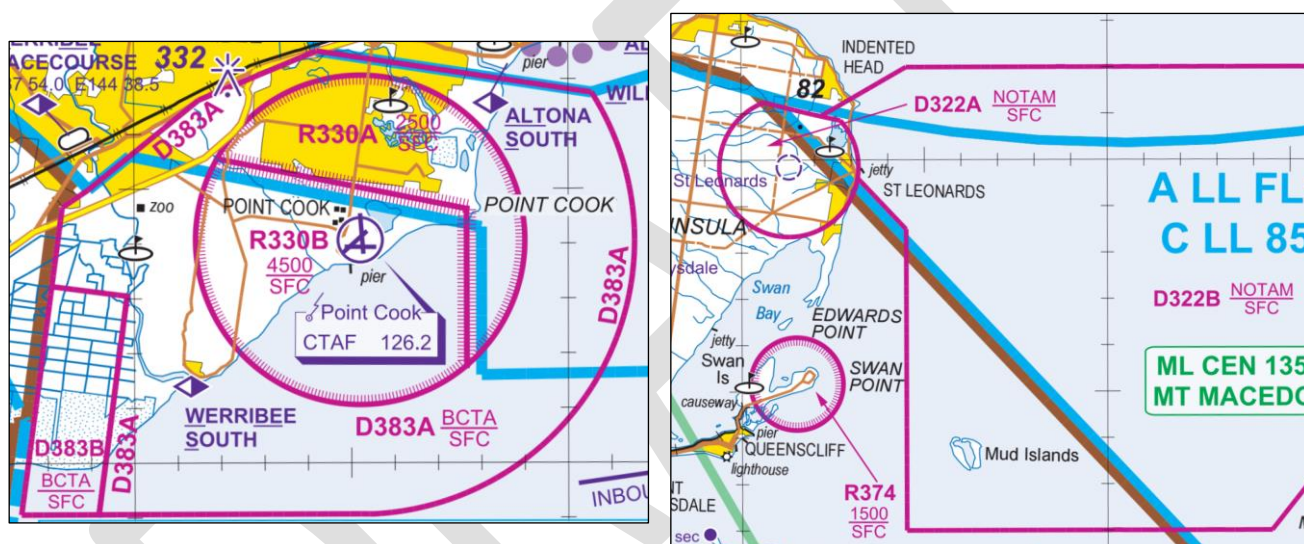


Figure 16: Review area Restricted and Danger Areas³¹

4.4 Air Routes

The air route structure in the Melbourne basin area, is primarily structured to support activity at Melbourne International Airport (Melbourne Airport). The air route structure will be reviewed in the next 5-10 years to support the planned parallel runway development at Melbourne Airport.

The air route structure around Avalon is such that most aircraft arrive from the north or east. There are limited air routes for aircraft travelling to or from west or south and aircraft are sequenced with the Melbourne and Essendon air traffic sequence.

Air routes used by PTO and freight operations into Avalon enable aircraft to join an instrument approach via the JAYBI STAR. As previously identified, this STAR leads aircraft to join the ILS or LOC procedure to RWY18. Other instrument approach and landing (IAL) procedures, including those to RWY36 are disconnected from this STAR.

Instrument departure procedures are via the AVALON DEPARTURE. This omni-directional departure procedure provides applicable obstacle clearance to departing aircraft from Avalon. Aircraft would then join an air route as per their flight plan.

³⁰ DAH effective 8 November 2018 shows Aerosonde as the contact. This will be amended for DAH effective 23 May 2019.

³¹ Melbourne VTC effective 8 November 2018, Airservices Australia

- Gellibrand Hill – This site has Primary Surveillance Radar (PSR) and Secondary Surveillance Radar (SSR) units^{34,35}. The PSR has a range of 50 NM while the SSR has a range of 255 NM;
- Mount Macedon – SSR unit with a range of 255 NM and an ADS-B ground station;
- Mount Tassie – ADS-B ground station; and
- Mount William – ADS-B ground station.

Air traffic services are provided by Melbourne TCU.³⁶ Avalon Approach has responsibility for the Avalon CTR Class D and Avalon Class E CTA within the lateral boundary of the CTR. Additionally Avalon Approach is responsible for the Avalon Class E CTA steps outside Avalon tower hours.

Avalon is currently the only location in Australia that has daily international PTO with a Class D CTR.³⁷

Melbourne TCU controls Avalon airspace instead of Avalon Tower. This operation is similar to locations with a Class C control zone where, the tower controllers concentrate on runway and taxiway operations. However, separation issues can occur on departure with Avalon Approach when attempts are made to give traffic information on aircraft in Class E airspace and the departure instruction through Avalon Tower.

Avalon Tower has a Tower Situational Awareness Display (TSAD) available to the duty controller. The TSAD information displayed in the tower is sourced from the Eurocat system in Melbourne Centre which is then relayed to Avalon tower. The distinction from a full radar Air Situation Display (ASD), is that a TSAD can't be used for aircraft separation purposes. Enabling use of surveillance for separation by tower controllers may does provide an enhancement to services within the airspace.

4.6 Environment

The airspace within 15 NM of Avalon was reviewed to examine if there are current aircraft environmental issues associated with:

- Noise;
- Gaseous emissions;
- Interactions with birds and wildlife; and
- Environment Protections and Biodiversity Conservation Act 1999 (EPBC Act) items.

There have been no environmental issues determined that affect the reviewed airspace. Matters relating the interactions with birds and wildlife are the responsibility of the airport's wildlife management program and are normally detailed within their Operations Manual.

4.7 Airspace Protection

The aim of airspace protection is to ensure a safe environment for aircraft operating in all conditions by identifying airspace that obstacles should not infringe.

Certified and registered aerodromes identify critical aviation surfaces through the OLS and if appropriate to that location, the PANS-OPS surfaces. Military aerodromes are neither certified or registered aerodromes however are affected by developments around their airfields.³⁸ Where appropriate, military aerodromes such as Point Cook develop an OLS and/or identify PANS OPS surfaces for the protection of airspace.

The Avalon Airport Master Plan 2015 identified the OLS for the existing runway at Avalon. This document identified the development of an Ultimate Design State OLS for existing and

³⁴ PSR – also known as Terminal Area Radar (TAR) which relies on radio waves reflecting off metallic objects within a short range of the primary radar site. Therefore, regardless if an aircraft has a transponder the PSR will detect an aircraft's position, altitude and speed.

³⁵ SSR – also known as enroute radar and relies on aircraft having a transponder which transmits an encoded data signal. This signal is interrogated by a ground station determining the aircraft's position, altitude and speed.

³⁶ The TCU is responsible an area of controlled airspace surrounding a major airport where there is a high volume of air traffic e.g. Melbourne, Sydney, Perth.

³⁷ International operations are conducted seasonally at Sunshine Coast (April to October) and approved at Broome. Avalon has daily international operations in Australia from a Class D CTR.

³⁸ Civil Aviation Regulations 1998 Section 3 (5) 'Application of regulations' provides that Civil Aviation Regulations do not apply to or in relation to state aircraft or to military aerodromes.

future runways that can be used in planning preparation. The status of this diagram is not known.

The Avalon Corridor Strategy is a project being delivered by the City of Greater Geelong, Wyndham City Council and the State Government Department of Environment, Land, Water and Planning. This project sets the strategic land use direction for the land between Lara and Werribee and it supports the continued growth of Avalon Airport including protecting the airport from encroachment by non-compatible land uses. The development of the Ultimate Design State OLS, which should include current and future PANS-OPS surfaces, would provide important information to this project.

5 Traffic

The data provided by Airservices shows that during the 2017 to 2019 period, total aircraft movements increased on average by 6.25% yearly. During the 2014 to 2016 period the yearly average increase in total aircraft movements was greater than 49%. Passenger movements have exceeded 1 million during 2019 at Avalon.

The following table provides data about passenger and aircraft movement for Avalon from March 2011 to March 2019.

Figures for the 12 months ending					
Month/Year	Total Movements	Air Transport Movements	Passengers	VFR Movements	IFR Movements
March 2011	9,474	7,448	778,987	2,162	7,312
March 2012	7,150	6,099	684,708	1,117	6,033
March 2013	5,693	4,761	534,833	1,001	4,692
March 2014	6,327	4,697	504,766	1,714	4,613
March 2015	9,332	5,412	521,828	4,062	5,270
March 2016	12,626	6,880	606,432	6,013	6,613
March 2017	12,220	7,737	752,718	4,482	7,738
March 2018	11,611	7,472	822,714	4,002	7,609
March 2019	13,753	8,429	990,255	5,165	8,588

Table 1: Airservices Australia movement data for Avalon, March 2011 to March 2018³⁹

5.1 Analysis of aircraft movements

Aircraft movement numbers in the review area are expected to increase over the next five years..

Avalon

Aircraft movement levels, specifically PTO, are expected to increase with the establishment of Air Asia operations at Avalon from December 2018. It is also reasonable to expect other airlines could expand the current operations at Avalon.

In 2018, there were 49 International freight movements at Avalon. Boeing 747 (B747) was the most common type of aircraft used in these operations. Other aircraft used for international freight operations include Antonov 124 (AN124), Airbus A330 (A330) and Boeing 777 (B777), Boeing 767 (B767) and Boeing 737 (B737).

The establishment of on-ground facilities at Avalon such as the international terminal, taxis or other ride sharing services and Skybus services operating to/from Melbourne support domestic and international passenger operations.

The Avalon Airport Master Plan Indicates total aircraft movements are expected to reach 62,000 by 2030/31 based on annual average growth rate of 17.8%.⁴⁰

³⁹ Source: Airservices Australia Passenger and Aircraft movement data Avalon Aerodrome 2011-2019

⁴⁰ Avalon Airport Master Plan 2015: Avalon Airport

Point Cook

There is limited data available with regard to movements at Point Cook. The operator has advised that aircraft movements in 2018 were approximately 68,000. Movements are expected to increase 10-15% in 2019 and this is primarily due to an increase in flying training that will be undertaken at Point Cook as civilian and military operations.

RMIT flying training have advised that in 2018, flying training increased 17% and will increase another 25% in 2019.

Barwon Heads

Barwon Heads airport supports a variety of fixed wing and rotary wing aircraft in operation at the airfield. Skydiving operations, warbird aerobatic flights, charter flights, flying training and emergency services operations are conducted from Barwon Heads. Geelong Helicopters had approximately 4,000 tourist flights in 2018 and Skydive Australia reported approximately 10,000 canopies over the 12 months, mostly from 14,000 FT AMSL.

Aircraft movements at other ALAs in the review area are not known and estimates were not available. However, these areas are used sufficiently given the condition of the landing surfaces as indicated by the diagrams in Section 3 – Aerodromes.

5.2 Analysis of passenger numbers

Passenger movement information was only available for Avalon.

The data shows a yearly average decrease in passenger numbers between 2011 and 2014 of 11.7% from 778,987 to 504,766 (total reduction – 35.2%). Between March 2014 to March 2019, average yearly growth in passenger numbers has been 19.2% from 504,766 to 990,255 (total increase 96.2%). This represents an overall increase of 27.1% between 2011 to 2019 and is attributed to Jetstar and recent Air Asia international operations.

Passenger movements are expected to increase by more than 10% each year for 2019 and 2020. Passenger numbers have exceeded 1,000,000 during 2019⁴¹.

⁴¹ Based on data for the 12-month period to 30 April 2019, passenger movements exceeded 1,000,000 at Avalon.

6 Aviation Occurrence Reports

The review of the aviation occurrence reports has identified that during tower hours, the operation of Class E airspace is not appropriate due to the diverse aircraft operations undertaken in the area. A change in classification will provide a risk mitigation to aircraft operating in this airspace to as low as reasonably practicable (ALARP) principles.

All aviation occurrences, consisting of incidents, serious incidents and accidents involving Australian registered aircraft, or foreign aircraft in Australian airspace, must be reported to the ATSB. The ATSB receives occurrence information via pilot reports, Airservices' Corporate Integrated Reporting and Risk Information System (CIRRIS) reports and the Australian Defence Forces' Aviation Safety Occurrence Reports.

The ATSB maintains its own database, the Safety Investigation Information Management System (SIIMS), in which all reported occurrences are logged, assessed, classified and recorded. The information contained within SIIMS is dynamic and subject to change based on additional and/or updated data. Each individual report is known as an Aviation Safety Incident Report (ASIR).

For identification purposes each ASIR is allocated its own serial number, detailed as an incident, serious incident or accident and is assigned one of the following Level 1 Descriptions:

- Airspace – includes airspace infringements, loss of separation (LoS), loss of separation assurance, breakdown of coordination/information error, error by ANSP instruction or pilot actions, encounter with a remotely piloted aircraft (RPA), Airborne Collision Alert System (ACAS) Warning
- Consequential Events – includes aircraft conducting missed approaches, fuel dumping, diverting or returning to aerodrome;
- Environment – most common description for a bird strike, evidence of bird strike after landing or locating animals during runway inspections but also includes lightning strikes and turbulence issues;
- Infrastructure – such as runway lighting, approach lighting and radio frequency failures;
- Operational – considers pilot actions and runway incursions (resulting in events including LoS), ground proximity warnings, terrain collisions, crew and cabin safety, smoke or fumes events, avionics and equipment issues; and
- Technical – includes airframe, systems such as landing gear indications and power plant matters e.g. engine running rough, engine failure.

A CIRRIS report is an electronically submitted air safety occurrence report which forms part of the risk information system maintained by Airservices Australia. Not all information in CIRRIS is required to be reported to the ATSB and there may be differences between the two reporting systems.

The airspace related incidents within 15 NM of Avalon from January 2013 to May 2019 were reviewed.

6.1 ATSB Aviation Safety Incident Reports

Type of Occurrence	Number of Occurrences						
	2013	2014	2015	2016	2017	2018	2019
Airspace	4	5	1	1	5	8	3
Consequential Events	2	3	6	4	4	6	0
Environment	11	16	22	29	28	20	21
Infrastructure	0	0	0	1	0	1	0
Operational	10	6	8	22	8	8	2
Technical	5	1	6	4	5	3	5
Total number of occurrences	32	31	43	61	50	46	31

Table 2: ASIR Occurrences Avalon Review area between Jan 2013 to May 2019

Airspace Occurrence	Number of Occurrences						
	2013	2014	2015	2016	2017	2018	2019
Loss of Separation	1	1				3	3
Airspace Infringement	1	1				3	
Near collision	1				2		
ACAS Warning		2					
Encounter with RPA					1		
Operational non-compliance	1	1				2	
Issues			1	1	2		
Total Airspace Incidents	4	5	1	1	5	8	3

Table 3: ATSB ASIR Airspace Occurrence Description Avalon review area 2013-2019

Although not a common occurrence, some of the reports included incidents where there was a loss of separation between high capacity IFR jet aircraft and smaller aircraft while operating in the Class E airspace around Avalon. The unpredictability of VFR aircraft operating in Class E airspace while IFR jet aircraft are in the critical phase of flight could lead to a serious event although the pilots from each respective aircraft are complying with airspace requirements.

An incident recorded on 4 July 2013, resulted from an A320 which was in an unstable configuration during an approach, conducted a missed approach. This resulted in a loss of separation with a departing Bell 412 (B412) helicopter as ATC had not protected the missed approach path for the A320. ATC attempted to maintain a vertical separation but the crew of the A320 could not comply with the initial instructions given by ATC. Separation reduced to 1.5 NM and 600 FT as the A320 was turned away from the B412.

ATSB report AO-2013-115 which followed this incident noted the comment from Airservices Australia that *'Of concern are the small layers of differing airspace classes with different service levels and frequency requirements.'*⁴²

Other noted reported incidents occurring at Avalon involving Class E airspace are:

- 22 Feb 2014 – The Cessna 172 (C172), cruising at 2,000 FT AMSL, did not track in accordance with ATC instructions which resulted in the Airbus A330, which was conducting circuits at 1,500 FT AMSL receiving a Traffic Collision Avoidance System (TCAS) Resolution Advisory (TCAS RA)⁴³ on the C172. The controller had passed traffic information to the crew of the A330.
- 8 March 2014 – Passing 2,500 FT AMSL on climb, the crew of the Airbus A320 observed an aircraft on TCAS. The controller subsequently advised the crew of a VFR aircraft crossing their track in Class E airspace and the A320 turned to maintain separation. The crew subsequently received a TCAS Traffic Advisory (TCAS TA)⁴⁴ on the aircraft.
- 8 Dec 2018 – A330 aircraft was departing Avalon via RWY 18 JUSTY 2 SID and a VFR C172 was cleared to operate east of the RWY centerline at 2,000 FT AMSL. Both aircraft were in receipt of traffic information however as A330 passed 2,500 FT AMSL on climb the aircraft received a TCAS RA. C172 was at 2,000 FT AMSL and the range 2 NM.
- 19 Jan 2019 – During approach, the crew of the Airbus A320 received a TCAS RA on the C172. A320 aircraft did not observe C172 on TCAS until aircraft was within 5 NM. A320 received TA followed by RA alerts. A320 climbed back to 3,000 FT AMSL and

⁴² Loss of separation between an Airbus A320, VH-VFJ and a Bell 412, VH-VAO; Australian Transport Safety Bureau, Canberra 2013.

⁴³ TCAS RA: an indication given to the flight crew recommending a manoeuvre or a manoeuvre restriction to avoid collision. RAs are nominally 15 to 35 seconds before the closest point of approach of the aircraft.

⁴⁴ TCAS TA: an indication given to the flight crew that a certain intruder/aircraft is a potential threat to the flight and potential RAs. Information conveyed in TAs is intended to assist flight crews in sighting nearby traffic and may generate up to 20 seconds in advance of an RA. This depends upon the sensitivity levels of the RA.

after clear of conflict, was able to continue approach. When controller questioned, A320 crew advised “It was Class E airspace.”

These incidents could have been avoided if there was a change to the airspace classification thereby providing an appropriate air traffic service to mitigate risk.

6.2 Airservices CIRRIS data

Primary Occurrence Type	Number of Occurrences						
	2013	2014	2015	2016	2017	2018	2019
ACAS Resolution Advisory	0	1	0	1	1	2	1
Aircraft Accident	1	0	0	0	0	0	0
Aircraft Conflicition	1	0	0	0	0	0	0
Airspace Infringement	9	5	12	8	9	9	3
Emergency Ops: IFER & Aerodrome	3	2	4	0	1	1	0
Information Error	2	0	6	3	1	4	3
Laser	3	0	3	5	2	3	1
Loss of Separation	1	0	0	0	0	3	0
Operational Deviation	2	3	3	1	1	3	2
Other – Safety Related	2	1	0	2	0	0	2
All other occurrences	2	1	0	3	2	2	3
Total number of occurrences	26	13	28	23	17	27	15

Table 4: CIRRIS data reported by Airservices Australia Jan 2013 to May 2019

7 Consultation and stakeholder feedback

Stakeholders were contacted and invited to provide comment or input to issues relating to Avalon airspace. Various on-site meetings were conducted with stakeholders during the consultation process and while issues outside the scope of the airspace review were discussed, these matters have been included for completeness. A list of stakeholders invited to contribute to this review can be found in Annex D.

7.1 Air Navigation Service Provider (ANSP)

The views considered below were obtained from ATC personnel and may not reflect the policy adopted by Airservices Australia.

- The primary issue ATC noted were matters with VFR and IFR aircraft operating in Class E airspace. Problems range from minor increases in communications and coordination to restructuring departure tracks for IFR jets departing Avalon.
- JUSTY SID should be amended to ensure no jet departure enters Class E during normal operations and is segregated from the preferred VFR training area. The current SID takes aircraft close to the RWY18 final approach path and the preferred area for VFR training located north east of the airfield.
- Amend Class E airspace with Class D airspace. To assist with VFR transiting aircraft, a corridor could be established south of the highway and north of the coast. Eastbound aircraft would transit at 3,500 FT AMSL and westbound aircraft transit at 4,500 FT AMSL (BCTA). This would keep VFR aircraft clear of the final and missed approach paths and allow ATC to tactically use 3,000 FT AMSL to keep IFR traffic clear of transiting aircraft.
- Class C airspace is unnecessarily restrictive to the mix of traffic that use Avalon airspace.
- Avalon tower should control the airspace and this would reduce the workload on staff operating at Melbourne Centre/Avalon Approach.
- The use of the ASD that enables radar like surveillance to be used for separation should be made available to ATC in the tower and not just TSAD. This would increase the efficient use of and access to the airspace by users.
- Changes to the Avalon airspace design should enable the facilitation of departures towards Tasmania and aircraft travelling west. The operations at Avalon should be similar to operations conducted at Moorabbin i.e. Class D CTR.

7.2 Airspace Users

There are number of users operating in the review area. Users range from large freight operations, international and domestic jet traffic, flight training, sports aviation and remotely piloted aircraft systems (RPAS). Feedback from these operators included:

- The overall airspace boundaries suit the north/south runway. An extension to the south east sector would facilitate more efficient airspace use.
- Large jet traffic operators would support a review of the airspace classification with the replacement of Class E. The mix of IFT and VFR traffic in Class E airspace at Avalon is briefed as a threat by their flight crews. Facilitating a higher level of service will provide a higher level of safety to operations.
- The airspace should support PBN operations and other efficiencies such as Continuous Climb Operations or Continuous Descent Operations (CCO/CDO).
- The current STAR at Avalon is only appropriate for the RWY 18 ILS or LOC procedure. Any other approach required additional vectoring or tracking to conduct and approach.
- PBN procedures linking to instrument approaches or air routes would be supported.
- A narrowing of the current airspace would impact future instrument approach procedures and would not necessarily be supported.
- The current airspace in the review area is good however for training purposes there is limited space available.
- Urban developments around Point Cook and the fly neighbourly instructions for Werribee, prevents flying training being conducted in these areas. Training is

conducted in the Avalon CTR, normally to the north east sector of the CTR while remaining clear of the runway centre. Changes to the airspace design and/or classification may 'box' flight training in a small area. This would result in congestion and an inefficient use of the airspace.

- Changes to the airspace may impact training where flights are required to transit further to undertake training. This is likely to be west of the Avalon CTR. This would unnecessarily increase costs and extend training times of students.
- R330A and R330B already limits the area available for flight training. D383B is the aerobatics area and generally used by one aircraft at a time.
- Flying training increased during 2018 and is expected to increase again in 2019.
- The current arrangement of Class E airspace on top of Class D airspace does result in non-standard practises by airspace users. Examples provided included some users making radio calls and some not.
- RPAS operators conduct complex manoeuvres within D322A and D332B.
- On average D322A is activated each month for a one-week period. Most operations are conducted up to 4,500 FT AMSL however CASA approval enables operations below 7,500 FT AMSL.
- RPAS activity will continue to grow in use and category of activity being conducted.
- RPAS integration of operation in controlled airspace using suitably equipped units should be considered. Operations within D322B would enable trials while complying with regulatory approvals i.e. operate below 7,500 FT AMSL and remain within the PSR area. This trial could identify practical issues for airspace that may not be identified during theoretical discussions.

7.3 Aerodrome Operators

Avalon Aerodrome

- There is continuing growth in passenger transport operations at Avalon.
- Additional international passenger flights are anticipated into and beyond 2019.
- Freight operations remain steady.
- The southern end of the Avalon airspace in the Leopold and Geelong area provides the highest number of noise complaints. The airport is conscientious of noise issues. Aircraft operating in these areas and generating these issues may be transiting VFR aircraft.
- Any changes to the airspace design or classification or tracking of aircraft should be consulted with stakeholders.
- Airservices Australia ARFF services are in accordance with the aircraft operating at the aerodrome.
- Emergency services, including Defence, are increasing activity at the airfield.
- Avalon Airshow 2019 will see an increase in aviation activity for the duration. March 2021 will mark the centenary of the RAAF as an independent service. It is anticipated that there will be national celebrations for this event including the 2021 Avalon Airshow.

Point Cook Aerodrome

- In 2018 there were approximately 68,000 movements conducted at the airfield. This included military and flight training movements.
- It is estimated during 2019, a 10-15% increase will occur due to consolidation of assets and anticipated training flights from other military locations.
- Overfliers at Point Cook are not complying with the instructions in ERSA. Some users are operating below 2,000 FT AMSL and/or transiting over when the RAs are active.

Barwon Heads Aerodrome

- Barwon Heads is an important departure and arrival point for Bass Strait aircraft.
- Barwon Heads has been in continuous use for 54 years with a mix of commercial and private operations.
- Parachute operations mostly from 14,000 FT AMSL occur from the airfield.

- Three R44 helicopters operated approximately 4,000 tourist flights between Geelong waterfront and Barwon Heads in 2018.
- Adventure flight Co conducts warbird aerobatic flights, charter flights to King Island and the Twelve Apostles and other scenic or business flights.
- Flight training is conducted at the airfield.
- Approximately 400,000 people attend Barwon Heads each year to fly, parachute, travel or watch.
- Pilots find the airspace around Avalon difficult to understand. This is due to the number of calls received for PPR. However commercial pilots and local pilots who fly regularly have no issues with the Class E setup.
- Changes to the airspace design or classification may impede traffic travelling East or West and also parachuting operations. Changes could place more aircraft outside CTA but between Barwon Heads that the coast some 2 NM south of the airfield causing unnecessary congestion.
- If possible, no change to the 8 NM step south of Avalon.

Little River Aerodrome

- Avalon Approach ATC's are very accommodating to aircraft operating into and out of Little River and familiar pilots are patient relative to obtaining inbound clearances and accommodating priority traffic management with Avalon airport. The healthy relationship that exists between local pilots operating out of Little River and Avalon Approach is appreciated and would like to ensure this continues.
- Ground communications from Little River with Avalon Approach 133.55 MHz and / or Melbourne Radar 135.7 MHz are very limited or broken (depends on Aircraft type/radio/antenna position). Many of our departure calls have to be obtained by calling Avalon Approach on landline. Ground communications remain an ongoing issue that could be resolved through the installation of a local repeater.
- Low intensity runway and taxiway lights and medium intensity threshold lights have recently been installed at Little River Airfield. The lights are remote controlled (not pilot controlled) and are used infrequently for night departures and arrivals.
- An examination where aircraft departing from or arriving at Little River without the need for a clearance should be explored. The increase in jet traffic has resulted in delays at Little River. Perhaps a redesign could place Little River outside the CTR, enabling aircraft access to Class G airspace.

8 Key Issues, Recommendations and Observations

The following key issues, findings, recommendations, observations or opportunities for improved emerged during this review through the analysis of incident data, stakeholder consultation and review of historical documents.

8.1 Avalon airspace classification

Issue: The classification of airspace in the review area should change.

Findings:

- PTO operators have stated that based on risk, Class E airspace during tower hours at Avalon does not provide the appropriate risk mitigation for air traffic operating in the area, particularly during tower hours. The increase in diverse air transport operations including additional PTO, flying training and freight operations could be mitigated by changing the airspace classification.
- The airspace classification should be appropriate to characteristic of the required air traffic service.
- High capacity domestic and international jet traffic as well as light aircraft operate in a surveillance coverage area. This presents an occurrence risk that could occur with extremely rare probability but could have serious consequences.
- There have been a number of TCAS TA/RA occurrences reported between high capacity jet traffic and light aircraft between aircraft operating in different classes of airspace.
- Air traffic services are provided by Avalon Approach in the Melbourne ATC centre. Avalon Tower does not operate any airspace except on a circuit release, when required.
- Aeronautical publications are inconsistent regarding published information on the description of the airspace at Avalon.
- ATC are over servicing the airspace according to its classification.
- Operations at Avalon CTR are different to other Class D CTRs, including Moorabbin which is also located within the Melbourne basin. ATS and users operating in any class of airspace should have predicable and consistent procedures.
- ATSB report AO-2013-115 noted comment from Airservices Australia that “Of concern are the small layers of differing airspace classes with different service levels and frequency requirements.”
- During 2018, there were 49 freight operations involving large aircraft. The majority of freight operation movements occurred during large motor sporting events such as the Formula 1 Grand Prix and Moto GP.
- Any airspace changes will be subjected to further examination and consultation during any Airspace Change Proposal (ACP) process.

Recommendation

Airservices Australia should review the airspace design and submit to CASA an Airspace Change Proposal to remove the Class E airspace in accordance with the report’s findings and to ensure the airspace classification aligns with the appropriate level of air traffic service at Avalon.

8.2 Avalon airspace design

Issue: The airspace design should be redesigned.

Findings

- The current airspace is designed on ground-based aviation technology. Changes to available technology, mandates, enhanced surveillance and modernised aircraft and communications has led to changes in the air traffic service environment.
- The current airspace architecture is inconsistent with regard to the current level of service. The Class D CTR at Avalon operates differently to other Class D CTRs in Australia.

- ATC services within the Avalon airspace are (mostly) provided by Avalon Approach in Melbourne ATC Centre. Avalon tower does not control the airspace, unless on circuit release. Operations at Avalon tower are similar to services provided at a major capital city Class C CTR.
- Avalon approach controllers over service the airspace according to the airspace classification.
- Under utilised surveillance capability at Avalon as the location is within PSR coverage from Gellibrand Hill (Melbourne).
- In 2013, Airservices indicated that the process for redesigning the airspace had commenced.
- Air traffic into Avalon is predominantly from the north of the aerodrome.
- Instrument flight procedures at Avalon are not compliant with MOS173 regarding airspace containment. Redesigning Avalon airspace can review containment of instrument flight procedures, extend/expand airspace boundaries to enable aircraft operations to the south east and north west of Avalon.
- Redesigning Avalon airspace would consider possible future changes to Melbourne airspace thereby minimising possible future changes affecting Avalon airspace.

Recommendation

Airservices Australia should review and implement changes to Avalon airspace architecture based on PBN airspace criteria.

Observation/Opportunity for Improvement

Avalon tower does not control any airspace unless on circuit release. The tower is staffed daily between 0700 hours to 2300 hours (local time). The airspace is controlled by Avalon Approach in Melbourne ATC Centre. This operation is consistent with a Class C CTR and not a Class D CTR. There should be a consistency and standardisation of airspace and procedures to reduce complexity for ATC and airspace users.

Avalon tower currently has access to TSAD and is located within the limits of the Melbourne PSR. Access to this surveillance for Avalon tower staff will enhance the safety and efficiency of controlled airspace.

8.3 Aeronautical publications

Issue: There are inconsistencies with the information published in aviation documents including aeronautical charts, departure and approach procedures and DAH.

Findings

- The description of Class E airspace at Avalon in DAH is not consistently displayed on aeronautical charts.
- The lower level of Class E airspace at Avalon in ERSA is not consistent with the information published in DAH.
- The lower levels of Class E airspace at Avalon and other locations in Australia, such as Mackay and Rockhampton, does not indicate the lower level is above ground level.
- Avalon RNAV (GNSS) approach procedures via the off-set initial waypoints are not compliant with PANS-OPS. Approaches via the straight initial waypoint are compliant with PANS-OPS.
- The Moorabbin NDB-A DAP chart notes that the Avalon-Moorabbin track conflicts with the Point Cook RNAV APCH, however there is no reference about this conflict on the Point Cook RNAV RWY 35 chart.

Recommendations

The OAR recommends:

- Airservices Australia should review the DAH and submit amendments to remove inconsistencies with other published aeronautical information for Avalon.
- Airservices Australia is to ensure published instrument approach and landing procedures for Avalon are compliant with ICAO PANS-OPS.

Observation/Opportunity for Improvement

Avalon ERSA entry could include notification of the runway lighting at Little River to assist with pilot situational awareness.

8.4 Airspace Protection

Issue: Avalon is a major international airport and Point Cook is a central military aerodrome in the Melbourne basin and the airspace should be protected for aviation activity.

Findings

- Avalon and Point Cook aerodromes are not included in the Airports Act or Airports Regulations.
- Planned developments have or will occur in and around these aerodromes.
- Avalon and Point Cook aerodromes are strategically important to civilian and military operations.
- Avalon aerodrome, in the context of Melbourne's second international airport, does not have a finalised diagram that identifies critical surfaces for airspace protection for the two planned runways identified in the Avalon Airport Masterplan 2015.
- Point Cook does not have an airspace protection diagram.

Observation/Opportunity for Improvement

To assist with the safeguarding of flight path protection, Avalon Airport should develop a prescribed airspace like diagram for this purpose.

Point Cook should develop an airspace protection diagram or model that identifies the limiting surface elevations where obstacles should not infringe. This would ensure the safety of aircraft operating in the airspace under all conditions at the aerodrome.

9 Conclusion

The OAR has conducted a review of the airspace within 15 NM of Avalon airport from the surface to 8,500 FT AMSL.

The review of the airspace complied with the requirements of the *Airspace Act (2007)*, Airspace Regulations (2007), the Australian Airspace Policy Statement (2018), the Minister's Statement of Expectation (2019) and CASA's Regulatory Philosophy.

The OAR will continue to monitor aircraft and passenger movement statistics, recorded incident data and other information sources to determine the appropriateness of the next airspace risk review.

Appendix 1 Avalon Airspace Review Description

The airspace within 15 NM of Avalon as shown on Figure 1.

- The Avalon Control Zone (CTR) is promulgated in a racetrack like shape with the northern and southern ends eight (8) nautical miles (NM) from the Avalon aerodrome reference point (ARP). The CTR is approximately 11.5 NM in width. The vertical limit is from the surface to 2,500 FT.
- When the CTR is active, Class E airspace extends above the CTR from 2,500 FT to 4,500 FT.
- When the CTR is not active, the above area is promulgated as Class E airspace from 700 FT AGL to 1,500 FT. The airspace from the surface to 700 FT AGL is Class G airspace.
- Class E airspace steps to the north (N) and south (S), aligned with the 18/36 runway to 12 Distance Measuring Equipment (DME) with a lower limit (LL) of 1,500 FT to 4,500 FT.
- North of the 12 DME northern step Class C airspace with a LL of 2,500 FT extends to and beyond the 15 NM review area.
- 30 DME Melbourne arc extending from the north west (NW) to the south east (SE) of Avalon and above the CTR, Class C airspace with a LL of 4,500 FT.
- NW of Avalon, between 30 DME and 45 DME Melbourne, extending clockwise, N of the 230 radial (R-230) from Melbourne VOR to St Leonards aircraft landing area (ALA), Class C airspace with a LL of 8,500 FT. Only minor portions are included in the review.
- Between St Leonards ALA and moving in a clockwise direction to the NW areas mentioned above, Class G airspace extends from the surface to 18,000 FT (FL180).
- Restricted areas (RA) R330A and R330B are located over and within 3 NM around Point Cook aerodrome. Respectively, each area is from the surface to 2,500 FT and surface to 4,500 FT (the LL of Class C airspace above each RA). The RA are controlled by the Point Cook aerodrome operator. The hours of activity for each based on Coordinated Universal Time (UTC) are Tuesday, Thursday, Sunday; 0315-0345 (1 hour earlier during hours of daylight saving (HDS)) or as amended by NOTAM. These areas have a RA3 conditional status.
- Danger area (DA) D383 is located at Point Cook. D383 is promulgated as a flying training area and includes an aerobatic area which borders the Avalon CTR. The vertical limitation is from the surface to the base of controlled airspace (BCTA). D383 is operated by the Point Cook aerodrome operator. The hours of activity are promulgated between sunrise to sunset (HJ) or as amended by NOTAM.
- R374 Swan Island is a 1 NM radius area around Swan Island. The area is from the surface to 1,500 FT. The RA is controlled by the Army Range Control Officer (RCO) Swan Island and is active 24 hours each day. This area has a conditional status of RA3.
- D322A is 1.5 NM radius area over St Leonards ALA. D322A is bordered by the 30 DME arc from Melbourne. D332B is an area extending E from D322A and over Port Phillip Bay. The areas are promulgated for the purpose of unmanned aerial vehicle testing. The vertical limitation for each is from the surface to the NOTAM elevation. The hours of activity are via NOTAM. The contact is Textron Pty Ltd.

Appendix 2 Network Coordination Centre Airwork Booking System

Airservices Australia’s Network Coordination Centre (NCC) is responsible for the maintenance of the online booking system in regard to availability of the airspace following advice from the Traffic Manager or Unit Tower Supervisor.

Practice instrument approach bookings can be taken from the current time up to 48 hours in advance, except for Essendon. Bookings for Essendon can only be taken from the present day and for the following day, after 0800 hours UTC.

Traffic Managers and Unit Tower Supervisors advise the NCC of variations to airwork bookings and availability. This could be due to emergencies, adjustments to available times or adhoc blackout periods.

Bookings numbers for the Melbourne basin vary dependent on the season however approximately 45-50 requests are submitted on average for each weekday. Bookings are generally approved within an hour, workload permitting. This timing is also dependent upon staffing levels for example, during nightshift periods, no approvals take place until staff resume operations in the morning.

The booking page for Avalon, Essendon and Moorabbin airports is located at <https://vic.bookawk.com/>.

- The system operates on a ‘first in/first served’ basis. This ensures that no priority or preference is given to any user on preferred timings.
- Users are required to log into the system and when in the portal are able to see available times at locations. The user is able to plan according to these times at these locations (which includes Essendon, Avalon and Moorabbin). Times when the airspace is not available are blocked out and clearly identifiable.
- Where users provide incorrect or insufficient information, the request is rejected and NCC staff explain to the user why their booking was denied. It is up to the user to resubmit and if done correctly the request is approved. If there is no resubmission of the request, the initial request is rejected with reason.

The following is an example of what users may observe identifying block out periods, booked and available timings.

Time (Local & UTC)	YMAV	YMEN	YMMB
06:30 (19:30)			
06:45 (19:45)	NAVBL		NAVBL
07:00 (20:00)		NAVBL	
07:15 (20:15)			NAVBL
07:30 (20:30)			
07:45 (20:45)	NAVBL		NAVBL
08:00 (21:00)			TAY RNAV LDG *
08:15 (21:15)	[Private] ILS MAP		
08:30 (21:30)	[Private] ILS MAP		
08:45 (21:45)	NAVBL		
09:00 (22:00)	[Private] VOR MAP	EN ILS NAVBL *	[Private] NDB MAP
09:15 (22:15)	[Private] ILS MAP		[Private] RNAV LDG
09:30 (22:30)	[Private] ILS MAP		[Private] NDB MAP
09:45 (22:45)	NAVBL		
10:00 (23:00)	[Private] ILS MAP		
10:15 (23:15)	[Private] VOR MAP		
10:30 (23:30)	ILM ILS CAPP		
10:45 (23:45)	NAVBL		[Private] GNSS LDG
11:00 (00:00)	LM VOR CAPP *	NAVBL	[Private] NDB LDG
11:15 (00:15)	[Private] VOR MAP		
11:30 (00:30)	TAY VOR MAP		ILM NDB LDG
11:45 (00:45)	NAVBL		
12:00 (01:00)	KZL VOR MAP *	EN ILS NAVBL *	[Private] NDB LDG
12:15 (01:15)	KZL ILS MAP *		
12:30 (01:30)	[Private] VOR MAP		[Private] NDB LDG
12:45 (01:45)	NAVBL		KZL NDB MAP *
13:00 (02:00)	[Private] ILS MAP		
13:15 (02:15)	[Private] ILS MAP		TAY NDB CAPP
13:30 (02:30)	[Private] VOR MAP		
13:45 (02:45)	NAVBL		
14:00 (03:00)	[Private] ILS MAP	NAVBL	
14:15 (03:15)	[Private] VOR MAP		OKM NDB LDG *
14:30 (03:30)	[Private] DGA MAP		[Private] NDB MAP
14:45 (03:45)	NAVBL		[Private] RNAV LDG
15:00 (04:00)	[Private] ILS MAP	EN ILS NAVBL *	[Private] NDB LDG
15:15 (04:15)	VDA VOR MAP *		
15:30 (04:30)	VDA ILS MAP *		VDA NDB MAP *
15:45 (04:45)	NAVBL		
16:00 (05:00)			
16:15 (05:15)		OXF ILS MAP *	
16:30 (05:30)	[Private] ILS MAP	[Private] ILS MAP	
16:45 (05:45)	NAVBL		
17:00 (06:00)	TAY VOR MAP	[Private] ILS MAP	
17:15 (06:15)	TAY ILS MAP	[Private] ILS MAP	
17:30 (06:30)		NAVBL	[Private] RNAV LDG
17:45 (06:45)	NAVBL		TAY NDB CAPP
18:00 (07:00)			
18:15 (07:15)	VDE VOR MAP *		
18:30 (07:30)	VDE ILS MAP *		

App 2: 1 Example of Victoria Airwork Booking⁴⁵

⁴⁵ Instrument Training Airwork Bookings Victoria for 19 December 2018, accessed 14 February 2019, <https://vic.bookawk.com/day.php?year=2018&month=12&day=19&area=5&room=8>

Annex A Acronyms and Abbreviations

Acronym/abbreviation	Explanation
AAPS	Australian Airspace Policy Statement 2018
ACAS	Airborne Collision Avoidance System
ACP	Airspace Change Proposal
Act	Airspace Act 2007
ADS-B	Automatic Dependent Surveillance - Broadcast
AFRU	Aerodrome Frequency Response Unit
Airservices	Airservices Australia
ALA	Aircraft landing area
ALARP	As Low As Reasonably Practicable
AMSL	Above Mean Sea Level
ANSP	Air Navigation Service Provider
ARFF	Aviation Rescue Fire Fighting
ASA	Aviation Safety Advisor
ASIR	Aviation Safety Incident Report
ATC	Air Traffic Control
ATS	Air Traffic Services
ATSB	Australian Transport Safety Bureau
BAU	Business as Usual
CASA	Civil Aviation Safety Authority
CCO	Continuous Climb Operations
CDO	Continuous Descent Operations
CTA	Control Area
CTAF	Common Traffic Advisory Frequency
CTR	Control Zone
DA	Danger Area
Defence	Department of Defence
DME	Distance Measuring Equipment
ERC	En Route Chart
ERSA	En Route Supplement Australia
FT	Feet
FL	Flight Level
GA	General Aviation
HJ	Sunrise to sunset
IAL	Instrument Approach and Landing
ICAO	International Civil Aviation Organization
IFR	Instrument Flight Rules
IMC	Instrument Meteorological Conditions
IWI	Illuminated Wind Indicator
km	Kilometre
kt	Knot
LL	Lower Level
MLAT	Multilateration
NCC	Network Coordination Centre (Airservices Australia)
NOTAM	Notice to air men
NM	Nautical Miles
OAR	Office of Airspace Regulation
PT	Passenger transport
PTO	Passenger Transport Operations
RA	Restricted Area

Acronym/abbreviation	Explanation
RAPAC	Regional Airspace and Procedures Advisory Committee
RFC	Request for Change
RNAV	Area Navigation
RPAS	Remotely Piloted Aircraft Systems
SAFRA	Surveillance Arrangements for Regional Airports
SID	Standard Instrument Departure
STAR	Standard Arrival Route
TAC	Terminal Area Chart
TCAS RA	Traffic Collision Avoidance System Resolution Advisory
TCAS TA	Traffic Collision Avoidance System Traffic Advisory
TIFP	Terminal Instrument Flight Procedure
TSAD	Tower Situational Awareness Display
UTC	Coordinated Universal Time
VFR	Visual Flight Rules
VMC	Visual Meteorological Conditions
VNC	Visual Navigation Chart
VTC	Visual Terminal Chart

Annex B Australian Airspace Structure

Class	Description	Summary of Services/Procedures/Rules
A	All airspace above Flight Level (FL) 180 (east coast) or FL245 elsewhere	Instrument Flight Rules (IFR) only. All aircraft require a clearance from Air Traffic Control (ATC) and are separated by ATC. Continuous two-way radio and transponder required. No speed limitation.
B	IFR and Visual Flight Rules (VFR) flights are permitted. All flights are provided with ATS and are separated from each other. Not currently used in Australia.	
C	In control zones (CTRs) of defined dimensions and control area steps generally associated with controlled aerodromes	<ul style="list-style-type: none"> All aircraft require a clearance from ATC to enter airspace. All aircraft require continuous two-way radio and transponder. IFR separated from IFR, VFR and Special VFR (SVFR) by ATC with no speed limitation for IFR operations. VFR receives traffic information on other VFR but are not separated from each other by ATC. SVFR are separated from SVFR when visibility (VIS) is less than Visual Meteorological Conditions (VMC). VFR and SVFR speed limited to 250 knots (kt) Indicated Air Speed (IAS) below 10,000 feet (FT) Above Mean Sea Level (AMSL)*.
D	Towered locations such as Bankstown, Jandakot, Archerfield, Parafield and Alice Springs.	<ul style="list-style-type: none"> All aircraft require a clearance from ATC to enter airspace. For VFR flights this may be in an abbreviated form. As in Class C airspace all aircraft are separated on take-off and landing. All aircraft require continuous two-way radio and are speed limited to 200 kt IAS at or below 2,500 FT AMSL within 4 NM of the primary Class D aerodrome and 250 kt IAS in the remaining Class D airspace**. IFR are separated from IFR, SVFR, and provided with traffic information on all VFR. VFR receives traffic on all other aircraft but is not separated by ATC. SVFR are separated from SVFR when VIS is less than VMC.
E	Controlled airspace not covered in classifications above	<ul style="list-style-type: none"> All aircraft require continuous two-way radio and transponder. All aircraft are speed limited to 250 kt IAS below 10,000 FT AMSL*. IFR require a clearance from ATC to enter airspace and are separated from IFR by ATC and provided with traffic information as far as practicable on VFR. VFR do not require a clearance from ATC to enter airspace and are provided with a Flight Information Service (FIS). On request and ATC workload permitting, a Surveillance Information Service (SIS) is available within surveillance coverage.
F	IFR and VFR flights are permitted. All IFR flights receive an air traffic advisory service and all flights receive a flight information service if requested. Not currently used in Australia.	
G	Non-controlled	<ul style="list-style-type: none"> Clearance from ATC to enter airspace not required. All aircraft are speed limited to 250 kt IAS below 10,000 FT AMSL*. IFR require continuous two-way radio and receive a FIS, including traffic information on other IFR. VFR receive a FIS. On request and ATC workload permitting, a SIS is available within surveillance coverage. VHF radio required above 5,000 FT AMSL and at aerodromes where carriage and use of radio is required.

* Not applicable to military aircraft

** If traffic conditions permit, ATC may approve a pilot's request to exceed the 200 kt speed limit to a maximum limit of 250 kt unless the pilot informs ATC a higher minimum speed is required.

Annex C Restricted Areas and Danger Areas Architecture

The declaration of a Restricted Area (RA) creates an airspace of defined dimensions within which the flight of aircraft is restricted in accordance with specified conditions. Clearances to fly through an active RA are generally only withheld when activities hazardous to the aircraft are taking place, or when Military activities require absolute priority.

RAs are generally promulgated at specified times and dates which are detailed in the Designated Airspace Handbook (DAH). However, a Temporary Restricted Area (TRA) may be declared for special events where there may be a public safety issue – such as the Avalon Air Show, the Olympic Games or a police activity that requires control access to airspace in a particular area.

TRAs may have different periods of activation that can occur over a day or multiple days. For example, an air display may require a TRA for a short period of time such as 30-60 minutes. However, an air show, sporting event or military exercise may require a number of hours each day, over a number of days in order for the activity to be completed.

In order to assist with shared use of airspace, all restricted areas have been allocated a “Restricted Area Conditional Status”. This status will give an indication as to the likelihood of obtaining a clearance to fly through restricted airspace. NOTAMs may be issued to indicate changes to the RA Conditional Status.

The following definitions apply to the conditional status types of RAs:

- **Conditional Status RA 1:** Pilots may flight plan through the Restricted Area and upon request will be granted a clearance from ATC when the area is active unless a NOTAM indicates that a clearance is not available;
- **Conditional Status RA 2:** Pilots may not flight plan through the Restricted Area or expect a clearance from ATC. However, tracking may be offered through the Restricted Area on a tactical basis by ATC unless a NOTAM indicates that a clearance is not available; and
- **Conditional Status RA 3:** Clearance through the Restricted Area is not available except in a declared emergency.

RAs are mainly declared over areas where Military operations occur however, RAs also cater for communications and space tracking operations.

The declaration of a Danger Area (DA) defines airspace within which activities dangerous to the flight of aircraft may exist at specified times. Approval for flight through a DA outside controlled airspace is not required. The airspace remains available for other aircraft to use or operate within however, pilots are expected to maintain a high level of vigilance when transiting or operating within DAs.

DAs are primarily established to alert aircraft on the following:

- Flying training areas where student pilots are learning to fly and / or gather in large numbers;
- Parachute operations;
- Gliding areas where communications with airborne gliders might be difficult;
- Unmanned aerial vehicle testing or operations;
- Weapon firing and rifle ranges;
- Blasting at mine sites.

Annex D Stakeholders

The following stakeholders were contacted to contribute to this review/study. Amend as required

Organisation	Position
CASA	Various
Jetstar	Head Office
Avalon Airport	Operations Manager
Airservices Australia	Various
Victoria RAPAC	
Little River ALA	Operator
Barwon Heads ALA	Operator
Textron Pty Ltd	Operator
Point Cook Airport	Operator
RMIT Flying Training	Chief Flying Instructor
Torquay Airport	Operator
Geelong Council	
Wyndham Council	
Victorian State Government Department of Environment, Land, Water and Planning	Executive Director, Planning and Heritage

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Annex F Stakeholder Consultation / Feedback Register

TABLE TO BE COMPLETED

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