

COMMERCIAL SEAPLANE OPERATIONS
ON
LAKE BURLEY GRIFFIN

1. Introduction

1.1 This submission builds on previous advice provided to the NCA. The submission specifically provides further comment and further information in response to the NCA discussion paper ‘*Seaplanes on Lake Burley Griffin*’ released by the NCA on 7 May 2021. In that regard, we note with some disappointment that issues previously advised to the NCA by the Canberra Yacht Club (CYC) do not appear to have been given adequate consideration, with some significant issues either dismissed in passing after brief reference or substantially ignored.

2. Canberra Yacht Club Position

2.1 The CYC acknowledges that the proposed commercial seaplane operations on Lake Burley Griffin as an attractive proposition for the ACT Government and the NCA, as well as for the proposed operators and their potential market. However, we also see these proposed operations as presenting very significant risks to our operational and financial viability and, hence, to our continued existence. Accordingly, the CYC does not support the proposed seaplane operations on West Lake and would strongly prefer that they do not proceed in that location.

2.2 We welcome the opportunity provided by the consultation process to engage with development and decision making in respect of this proposal.

2.3 We acknowledge that the proposed commercial seaplane operations may receive approval and proceed, notwithstanding:

- The CYC’s long term constructive and significant presence and operations on the Lake.
- Our central place, since Lake Burley Griffin was first filled, as an integral part of the social and recreational heritage of the Lake and, hence, of the NCA’s stated strategies for recreational use of the Lake¹.
- The social contribution and value of our very successful inclusion programs: *Sailability* and *Buoyed Up*.
- The size, frequency and significance of our sailing activities on West Lake: both our Club racing program and the several major championship regattas we host each year,
- The size and significance of our Sailing School - we operate one of the largest club based sailing schools in Australia - and its essential centrality to both supporting sailing and, as a not-for-profit but a for-purpose activity, enabling our inclusion and racing programs.

¹ NCA: Lake Burley Griffin Recreation Policy 2017

- The substantial concerns and risks we outline in this submission.

2.4. Our concerns with the proposed commercial seaplane operations are based on their adverse impact on, and significant risk to, the CYC and CYC Sailing School's operations, safety and financial viability.

2.5 We are committed to working constructively with the NCA, the seaplane operator and all other authorities to identify workable options and arrangements which could address our concerns and mitigate the significant risks which would be imposed on the CYC.

3 The Canberra Yacht Club

3.1 Founded in 1959 in response to the announcement of plans to create Lake Burley Griffin, the Canberra Yacht Club has been part of the Canberra Community for over 60 years and is a significant part of the lakeside and on-water social fabric. We have been an integral part of the cultural heritage of West Lake as long as there has been water there. Canberrans "go to the yacht club" for family outings and to enjoy the picnic vista which includes yachts racing and adults and children learning to sail.

3.2 The Club has been operating on the lake since it was opened and at its current site since 1966. The CYC as an entity is a not-for-profit profit organisation conducting business for the purpose of financing and supporting our three major fields of sailing activity - club and major regatta racing, inclusion and the CYC Sailing School. Each of these activities is critically dependent on sustained safe access to and usage, particularly of all of West Lake:

3.3 Club Racing: The CYC conducts club racing primarily for our members throughout the year:

- Between early September and early April, every Sunday, with boats on the lake from 1:00pm until about 6:00pm.
- During daylight savings every Wednesday evening with boats on the lake from about 5:00pm through until as late as 7:30pm.
- During winter, every second Sunday with boats on the lake from around 12:00 noon until about 5:00pm.

Club racing generally sees between 40 and 90 boats in nine boat class and performance-based divisions with up to 150 sailors competing.

3.4 We usually host up to four or five major championship regattas each year, although the COVID 19 situation has restricted that over the past year. These can be national or state championships often for one or more specific boat classes and, less frequently, have included international championships. These regattas will normally be centred around a weekend but can run for up to 5-7 days with racing continuously from mid-late morning through until late afternoon. We have several of these regattas currently in planning over the coming year. The first of these was in April 2021 with the very successful national championships hosted by the CYC for the Hansa class, which will be used for the next Paralympic Games. All the state, national and international regattas bring strong contingents of visitors, competitors and supporters to Canberra.

3.5 Inclusion: The CYC provides two well recognised and highly valued inclusion programs, extending sailing to people of all abilities and to youth participants who would not otherwise have access to sailing. These programs, which have been financially supported by the CYC, by donors and by government agencies, are:

- *Sailability* which provides opportunities for people of all abilities to get into and regularly participate in the sport of Sailing. The CYC provides an additional level of support infrastructure and equipment and an established network of volunteers to enable this participation. Operating in the ACT since 1996 and at the CYC since 2017, this highly regarded program usually attracts around 80 participants, supporters and volunteers each week. This program operates on Sundays and in support of club and championship racing. *Sailability* is also the primary vehicle for the recent Hansa Dinghy National Championships referred to at 3.4, above. We are happy to provide further detail on *Sailability* as part of any further consultation.
- *Buoyed Up* is a charitable initiative of the Canberra Yacht Club which enables disadvantaged and at-risk children aged 7-12 years to participate in its Junior Sailing program as a means of building confidence, self-esteem and engagement in an active lifestyle. This program has been operating at the CYC since 2011, working closely with a number of schools in the ACT. In that time *Buoyed Up* has taught sailing skills to over 1600 vulnerable youth from around Canberra. Two studies undertaken by the University of Canberra have highlighted the significant beneficial effects of this program for its participants. *Buoyed Up* operates on school days during terms 1 and 4 each year. We are happy to provide further information on *Buoyed Up* as part of any further consultation.

3.6 CYC Sailing School: As noted at 2.3, above, our Sailing School is one of largest club based sailing schools in Australia. The CYC Sailing School's annual throughput across school holiday programs, ongoing sailing and racing programs as well as our adults sailing courses is of the order of 1100 participants each year.

- The CYC Sailing School is our major vehicle for promoting initial and ongoing sailing participation.
- It is a business operation which is not for profit but for the purpose of making our other programs possible as well as operationally and financially viable.
- Sailing School operations run mainly throughout spring, summer and autumn with operations on most days after school hours during the week, all of both weekend days and, during spring, summer and autumn school holidays, all day from around 9:00am to 4:30pm, every day.
- With up to 70 participants on the water during school holiday programs, divided into a number of groups, the Sailing School's operations depend on sustained safe access to, and uninterrupted usage of, much of the area of West Lake.

3.7 Without the ability of the CYC Sailing School to offer value for money sail training programs, the sustainability and viability of the CYC as an entity, along with its racing and inclusion programs, is threatened.

4. CYC & CYC Sailing School: Impact on Operations

4.1 The essential format for both club racing, accommodating the range of boats and performance levels across our nine major racing divisions, and all our championship regattas requires unobstructed and uninterrupted use of all of the West Lake area for the full period before, during and following completion of racing. It is not possible, for example, to stop and suspend racing for the duration of seaplane landing and takeoff in the middle of a race. Nor, given the well established patterns of prevailing winds here and the confined nature of the West Lake area, is it possible to relocate racing from the main area of West Lake or keep

racing clear of a substantial central part of it. Particularly on legs of the course to windward, the need for boats to tack necessitates use of the full width of the available space on the Lake.

4.2 Either complete curtailment or significant restriction of on-water CYC and CYC Sailing School activity would be necessitated for an unacceptable proportion of any day whenever the seaplane is operating on West Lake. In addition to the relatively short timeframes for actual taxiing, takeoff and landing, the time needed to get Sailing School boats out of West Lake, either off the water or into a designated alternative area and then back out would take up an unacceptable proportion of the available training time - up to an hour twice a day, both in core training times. The comment in the GML Heritage consultants' advice, page 7:

“The timing—one landing and one take-off in the morning and in the afternoon—is suitable and could be scheduled to ensure the minimisation and disruption to the other lake users and recreational activities.”

ignores this reality and reflects poorly on that report. The CYC's ability to offer viable, value-for-money sailing school products would be substantially disabled.

4.3 The impact on a substantial and highly fluid population of Sailing School students should also be noted, particularly in relation to holiday programs where a cycle of week-long courses, provides greater challenges in acclimatising sailors to seaplane operations, regardless of how safe these might be.

4.4 Commentary at page 20 of the NCA discussion paper ignores the full scope, detailed at 3.6, above, and in previous written advice to the NCA, of the Sailing School continuous week-round operations throughout spring, summer and autumn, which are far more than just the 'school holiday programs' mentioned.

5. Seaplane Operations

5.1. The proposed commercial seaplane operations envisage at least three regular scheduled return flights between Canberra and Sydney each day involving:

- the first and last flights of the day into Canberra Airport, with flights into and from Lake Burley Griffin at around 10:00am and 3:30pm; and
- undisclosed/unknown program of proposed operations on weekend days.

5.2 We now note, in addition, the proposal for a South Coast based company to offer flights, albeit apparently unscheduled and with operations possibly partly outside our Sailing School and Racing critical timeframes.

6. The Trial Flight

6.1 The trial flight in December 2020 highlighted several issues:

- The aeroplane used by Sydney Seaplanes, a single engine Cessna Caravan, was not the aeroplane, a twin engine DHC-6 300 Twin Otter, that is proposed for the seaplane service.
- The Twin Otter is more powerful and slightly more noisy than the Cessna Caravan, and has a short takeoff distance to 15 metres altitude. Noise issues are not a significant concern for the CYC.
- The original intent, raised with the CYC on the Friday before the trial, was for the aeroplane to use the public jetty at the CYC. Use of this jetty would have very substantially increased the safety risk around the seaplane's operations and would

have unacceptably exacerbated all of the adverse impacts on Sailing School operations. (In view of our concerns, this was changed for the trial to a jetty in Yarralumla Bay).

- It is still not clear to us whether actions of the NCA staff in requiring all Sailing School boats off the water during the trial demonstration flight indicate an NCA position that the seaplane operations preclude any concurrent boating on West Lake.
- In a light easterly breeze, which diminished and shifted after landing on the day of the trial, the seaplane landed and took off in an easterly direction, with the takeoff towards CYC Sailing School boats.
- There was no notification or warning to the CYC at takeoff and the takeoff run seemed longer than was expected, causing concern to Sailing School students and staff unable, in absence of warning time, to have entirely cleared the area.
- Unbelievably, given that the operations of the Sailing School had been significantly disrupted, the GML Heritage consultants' advice, page 6, found that:

“...the trial flight was not overly disruptive to the activities on the lake (noting that it was a weekday), was quieter than expected and completed in a short period of time.”

This is simply does not reflect the situation at that time.

- The trial demonstrated the need for the seaplane operator to communicate and/or coordinate the landing and takeoff with users on the Lake at the time of these operations.

7. DHC Twin Otter

7.1 The DHC Twin Otter proposed for the Sydney Seaplanes commercial service is a larger aircraft than the one used for the trial and that brings potential advantages, particularly in increased engine power for shorter landings and takeoffs.

Available information indicates on-water takeoff and landing distances of the order of:

- 599 - 685 metres for on-water take off to clear 15 metres altitude; and
- up to 531 metres for on-water landing from a height of 15 metres, noting the aircraft's apparent ability to stop from an on-water landing in significantly shorter distance if needed.²

7.2 Noting the information, sourced from Sydney Seaplanes and depicted in the NCA discussion paper (maps at pp 12, 18 and 26), the operating capabilities of their aircraft proposed for use appear to allow for other options for its operations on Lake Burley Griffin than solely the West Lake area.

² Viking Air - comparable 400s Otter: <https://www.vikingair.com/twin-otter-versatility/optimized-seaplane> and <https://teamjas.com/twin-otter-on-floats/> and, for comparison between the 300 and the 400, land data from: https://en.wikipedia.org/wiki/De_Havilland_Canada_DHC-6_Twin_Otter

8. Longer Term Viability

8.1 We accept that the seaplane operators will have assessed the market for this service very carefully, as this would be a precondition to financing its acquisition or lease of the proposed aircraft.

8.2 South Coast Seaplanes More information is available in respect of the Sydney Seaplanes proposal than for the South Coast Seaplanes proposal, which involves a Maule M5-235C seaplane with STOL capability and a capacity for three passengers. The operator's current pricing is for similar operations from the Moruya River and other South Coast locations. Their proposed flight times of 9:00am and 5:00pm appear to be potentially a little less disruptive of CYC and Sailing School Operations, depending on flight duration and, hence, proposed morning flight landing times.

8.3 Sydney Seaplanes Noting that current air travel occupancy rates between Canberra and Sydney are of the order of 75%, constant 100% seat occupancy would see a maximum total potential revenue to the operator of the order of \$27,000.00 per day before all costs - such as aircraft financing, operating costs (approximately \$650.00 per hour, or \$3900 per day³), infrastructure and maintenance costs, salaries, tax, airport fees, lake usage fees to the NCA and other overheads before profitable return on investment.

8.4 Rose Bay is not in the Sydney CBD. Neither of the only two apparently suitable wharves in West Lake are in the Canberra CBD. In both instances there remains a departure point to travel destination transfer overhead. Both Reconciliation Place and Regatta Point wharves in Central Basin could, however, offer better location and access options for transfers, if it were not possible for the aircraft to taxi under Constitution Avenue bridge to the proposed jetty at the National Museum.

8.5 Noting that most Government air travel into and out of Canberra is contracted on the basis of 'best fare on the day', the proposed commercial seaplane service may not be competitive for this substantial sector of its market.

8.6 Notwithstanding market and financial assessments, the history of introducing services such as this present proposal is that, if they do not generate sufficient revenue, they are often terminated after a fairly short period of time. The six months from the proposed commencement of this proposed service is critical to the operations and survival of the CYC, its inclusion programs and its Sailing School. This timeframe, if our operational and safety concerns are not satisfactorily addressed, would be sufficient to put us out of business.

9. The Operating Areas

9.1 Current practice on Rose Bay confirms the relatively short landing and takeoff distances needed with the current aeroplanes, at landing, able to stop in a very short distance if needed. Similarly, for takeoff, the pilots are adept at identifying and using safe takeoff areas even in heavy racing traffic.

9.2 When not airborne, seaplanes are, for the purposes of the applicable 'rule of the road' regulations, treated as vessels under power and subject to the obligations applicable to such vessels.

9.3 The guidance published by NSW Roads and Maritime Services in relation to shared use of Rose Bay describes the arrangements for shared use of a space much better suited to that sharing than West Lake in Lake Burley Griffin.

³ Viking Air <https://www.vikingair.com/twin-otter-information/operating-costs>

9.4 Rose Bay is a larger, wider area within which to operate than the West Lake area of Lake Burley Griffin. Of importance to note is:

- that area of Sydney Harbour also accommodates commercial seaplane operations concurrent with higher volumes of racing traffic than on Lake Burley Griffin; and
- West Lake in Lake Burley Griffin with its prevailing W-NW breeze and occasional Easterly is narrower and generally aligned with those breezes, with virtually no options to locate racing other than where the seaplanes would most likely need to land and take off, if using West Lake.

9.5 The different nature of the West Lake area is not adequately addressed by the comments at page 20 of the NCA discussion paper which seek to allay user concerns on the basis of experience elsewhere.

9.6 Comparison, in the NCA discussion paper at page 20, with longstanding very successful seaplane operations in Rose Bay reveals critical differences from the West Lake area. We note and accept the well-established skills and practices of the Sydney Seaplanes operating in Rose Bay. However, the maps in the NSW Roads and Maritime Services ‘*Best practice guide for the use of Rose Bay*’, highlight the differences on West Lake, particularly the access to the wider area of Sydney Harbour and the availability of sailing areas around, but clear of, where the seaplanes operate. Unlike Rose Bay, West Lake provides critically less scope to share a common, narrower general operating area with the proposed seaplane operations. There is nowhere else for boats to go to keep clear of seaplane operations right through the heart of an already quite confined sailing area and scheduled in the middle of core sailing times.

9.7 Similarly, comparisons in the NCA discussion paper (same page) with operations on the Moruya River are of little relevance. Firstly, the South Coast seaplane operations do not appear to be a regular service scheduled in the middle of core operating times for other users - so a degree of coordination is possible to avoid conflicts. Nor does the Moruya River near the town support regular sail training and racing. Secondly, the Moruya River, while narrow close to the town, is a vastly longer stretch of water running east-west and wide enough for seaplane operations. There is more than sufficient space to avoid the usage conflicts which are unavoidable on West Lake.

10. Heritage

10.1 We note the heritage advice provided with the NCA discussion paper. Other than passing reference in the NCA discussion paper (pp 4, 13 & 22) and in the GML Heritage advice, pp 10-11, to the cultural heritage value of the *Parliament House Vista*, particularly in the Central Basin area, and some references to current lake uses including sailing, the heritage assessment fails to adequately consider usage and cultural heritage values relating to West Lake. Moreover, the GML Heritage advice recommendation on page 7 for:

“scheduling a timetable for the operation that avoids disruption to other lake users and avoid peak periods of rowing, dragon boating, sailing races, lessons and recreational use, etc.”

is entirely in conflict with what is proposed, particularly for Sydney Seaplanes, in the NCA discussion paper.

10.2 As noted at 2.3, above, and at page 1 of the NCA discussion paper, the NCA’s responsibilities include:

‘...ensuring that the heritage values of Lake Burley Griffin and surrounds are upheld’.

The scope of this responsibility is further considered at pages 21 and 22 of the paper, particularly:

‘.. The lake is a unique and creative aspect of Australia’s most successful urban plan, which is highly valued by communities for its recreational uses and aesthetic qualities...’.

On this basis, as noted at 2.3, above, and mentioned, in passing, at page 10 of the GML Heritage advice, sailing, the CYC and its usage of the Lake from its opening are integral to the heritage values of the Lake.

10.3 The NCA Recreation Policy⁴ takes account of the recreational heritage values of Lake Burley Griffin, of which the CYC is an integral part. We bring highly visible and attractive life to this area of Lake Burley Griffin and our ability to continue doing so is threatened by the proposed commercial seaplane operations on West Lake to the extent that we believe alternatives in that location which address our risks and concerns can not be found.

10.4 The CYC believes that the usage and cultural heritage values of Central Basin need to be more carefully weighed up in comparison with:

- the potential for the proposed commercial seaplane operations on West Lake to extinguish the essential core of the CYC’s viability within a fairly short timeframe; and
- the heritage values of the CYC’s place and role in Lake Burley Griffin overall and, in particular, in West Lake.

10.5 During informal discussions with NCA staff, the CYC was advised that the Central Basin of Lake Burley Griffin was not the preferred location for the proposed commercial seaplane operations. This was attributed *inter alia* to seaplane operations being seen as not consistent with the heritage values of that part of the Lake.

10.6 The DHC 6 300 and the Maule M5-235C both have short takeoff and landing capabilities. From the approach, landing and takeoff profiles at page 24 of the NCA discussion paper, Central Basin provides sufficient space, including allowance for the two bridges, for these aircraft to operate safely in the wind conditions contemplated at page 20 of the NCA discussion paper.

10.7 The eastern approach and departure paths depicted at page 26 of the NCA discussion paper both envisage flight, at landing approach and immediate post-takeoff altitudes, across Commonwealth Avenue Bridge and Central Basin. It is logically indefensible to argue that takeoff and landing on Central Basin is more in conflict with that area’s heritage values than low altitude overflight of Central Basin, particularly given the short duration of on-water operation detailed at page 5 of the NCA discussion paper.

10.8 Importantly, Central Basin is not subject to, or needed for, the level of sailing and other boating operations needed by other users, including the Canberra Yacht Club on Central Basin.

10.9 The potential loss to both the Lake and to the Canberra community, including those whose particular needs are met by our inclusion programs, should be weighed carefully in

⁴ NCA: Lake Burley Griffin Recreation Policy 2017

comparison with the heritage impacts of locating a transient and short duration activity on Central Basin which has, in any case, previously been successfully undertaken there⁵.

11. The NCA Discussion Paper - Consultation

11.1 The NCA discussion paper, at page 6, suggests feedback on the proposed seaplane operations might consider a range of questions:

- *Initial Response*

Accepting the attractiveness to proponents of the commercial seaplane operations, the CYC sees these proposed operations as presenting very severe risks to our operational and financial viability and, hence, to our continued existence. Accordingly, the CYC does not support the proposed seaplane operations on West Lake and would strongly prefer that they do not proceed in that location. We are committed to working constructively with the NCA, the seaplane operator and all other authorities to identify workable options, alternatives and arrangements which could address our concerns and mitigate the significant risks imposed on the CYC.

- *Three Things to be Considered:*

Achieving arrangements which enable both the seaplane operations and the continuation of the safe operations and viability of existing lake users,

Balancing and upholding the value of all usage and cultural aspects of the Lake's heritage, and

The community value of the CYC's inclusion programs and our continued viability as the sole available provider of those programs.

- *Coverage of the Issues*

The NCA discussion paper falls significantly short in this regard in its incomplete coverage of the heritage aspects, in its selective and inadequate coverage of concerns put to the NCA in writing and in the NCA's failure to follow up on those concerns in developing the discussion paper.

- *Raising Awareness of the National Capital.*

As proposed and without use of alternatives such as Central Basin, any raised awareness will be of a diminished Lake Burley Griffin and, thereby, a diminished National Capital.

12. Conclusions

12.1 As noted at the outset of this submission it is the strong preference of the Canberra Yacht Club that, for the safety, risk and operational reasons canvassed in this submission, the proposed commercial Seaplane Operations do not proceed on West Lake.

12.2 We are keen to work with the NCA, the seaplane operators and all other authorities to identify workable options, alternatives and arrangements which could address our concerns and mitigate the significant risks imposed by this proposal.

12.3 In the Canberra Yacht Club's view, unless it is operationally impossible to do so, the best option is for the seaplanes to operate into and out of Central Basin. This option does not put at risk the ongoing viability of one of the oldest sporting and community clubs in

⁵ There has previously been a one recorded successful seaplane landing and takeoff on central basin

Canberra, and it involves access to two potentially more attractive jetty locations for embarking and landing passengers.

12.4 We believe that, if commercial seaplane operations from Central Basin are not possible and this proposal still proceeds, it will be essential to implement actions to mitigate the safety risks and adverse impacts on our business which might include:

- Agreed safe areas in West Lake for CYC Sailing School on-water activities to continue uninterrupted on West Lake during seaplane operations;
- Agreed communications / coordination with the seaplane operator, such as phone or radio notification 30 minutes before takeoffs and landings;
- Limitation of on-water seaplane operations during CYC and YMCASC racing days, including major state and national Championships particularly for the proposed afternoon flights;
- Exploration of alternative seaplane flight timings;
- Consideration of north-south / N-NNE takeoffs and landings adjacent and close to the eastern side of Black Mountain Peninsular, on a similar alignment to the main Canberra Airport runway; and
- Exploration, commensurate with known wind patterns and maintenance of an acceptable standard of racing, of practicable changes to CYC racing activities (noting that this would also need to extend to the YMCA Sailing Club as well).

12.5 The Canberra Yacht Club is ready to discuss alternatives for the proposed commercial seaplane operations which preserve our viability and that of our essential programs and may mitigate the safety and other risks. As the prime user of the body of water proposed to be used for the commercial seaplane operations, we would expect to be given the opportunity, not made available to us in the preparation of the NCA discussion paper, to provide further detail, where that may be useful in the consultation process and to respond to any questions in relation to this submission.

12.6 Our point of contact for further discussions is the CYC Commodore, Ms Sue Hart, contactable by phone on 0419 995 724, or by email at: sue.hart@iinet.net.au