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via email: seaplanes@nca.gov.au

Thank you for the opportunity to provide a submission on the proposal for possible seaplane operations on Lake Burley Griffin. Rowing ACT's submission is attached with this letter.

Rowing ACT is the peak body for rowing in the ACT and represents a community of over 1000 rowers from 14 clubs and schools. Our rowers range in age from 12 to 80+, skill levels from novice to elite, and come from all walks of life. The ACT is also home to a vibrant and growing para rowing community. But beyond just rowers, the ACT Rowing Community also includes coaches, officials, spectators and support staff. The ACT is also home to two rowing high performance centres – the Rowing Australia Men's National Training Centre, and the Rowing ACT/ACTAS High Performance Program – both located in Yarralumla Bay.

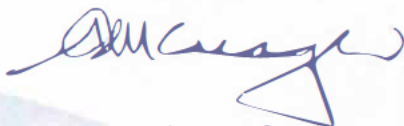
The ACT Rowing Community, like a lot of Canberrans, values the lake as a vibrant part of the ACT community, that should be able to be enjoyed by all.

Our submission raises several safety-related concerns that we believe need to be thoroughly considered, in conjunction with all lake users, prior to a decision being made on seaplane viability on Lake Burley Griffin.

Rowing ACT has also raised the possible development of a 'Lake Use Strategy' for Lake Burley Griffin, to ensure that future development on the waters and shores of Lake Burley Griffin are done in consultation with the lake users and broader Canberra community, to ensure the lake continues to prosper for all Canberrans and to address lake safety and infrastructure management.

Rowing ACT also seeks that, prior to the NCA making a final decision on this proposal, Rowing ACT, on behalf of the ACT Rowing Community, is afforded the opportunity to further discuss the concerns raised in this submission.

We are available to discuss these matters further at your convenience.



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The ACT Rowing Community

Rowing on Lake Burley Griffin (LBG) was established in 1964 when the lake was constructed and filled. The ACT rowing community is the largest lake user of LBG and consists of Rowing Australia (RA) Headquarters, RA Men's National Training Centre (NTC), the Rowing ACT/ACTAS High Performance Program and Rowing ACT Clubs and Schools. There are over 1000 rowers regularly using LBG throughout the year ranging in age from 12 - 80+ years old. Some of our rowers, coaches and support staff are employees while others are volunteers. There are 14 Clubs and Schools and two high performance training facilities (RA National Training Centre (NTC) and Rowing ACT/ACTAS) located around the shores of LBG from East Basin to West Basin with the major concentration of clubs, schools and high performance centres located in vicinity of West Basin and Yarralumla Bay. Rowers in the ACT vary in experience and rowing competence from beginner/novice to high performance/elite level and our community includes individuals with physical, visual and intellectual impairments. Rowers will train and compete in boats that vary in size from Singles to Eights. Rowers are supported by their coaches, support staff and boat race officials who operate small powered boats (tinnies).

Lake Usage

The ACT rowing community uses all of LBG throughout the year for training to enable long training sessions of 20+km. A buoyed rowing course for competition is on Yarramundi Reach and the National Time Trial Course of 2km runs from the white poles at Yarralumla Bay to the National Museum. Rowers are most vulnerable to boat wash that can cause capsizes, injuries and hypothermia. Rowers are often supported by coaches and Boat Race Officials who frequent the lake. While these groups are often on the lake in small powered boats that can manoeuvre more easily than rowing boats, quick manoeuvring to avoid collisions can result in high levels of wash, and have further flow on effects for rower safety on the lake.

High Performance Training. Training times on LBG for both the National and ACT high performance centres occur two to three times a day, seven days per week. Session times and locations of training will vary depending on the training program, weather and water conditions. Normal training times for ACT high performance rowers is between 5.30am to 10.30am and 2.30pm to 5.30pm. Rowing Australia's National Training Centre generally rows from 7.30am to around 4pm although their sessions vary depending on lake usage peak times and weather conditions. Their session times tend to include two morning sessions of over 90 minutes duration and one afternoon session.

Community Club Training. Clubs train on weekdays and weekends with training occurring mainly in the morning from 5.30am to 10am. Some clubs will have training sessions in the afternoon from 3pm. Individual rowers from clubs will use the lake throughout the day and

rowers will row on the parts of the lake where weather is most conducive to flat water rowing conditions. There are rowers with physical, vision and intellectual impairments in clubs throughout the ACT rowing community and these rowers will often train at times when there is less congestion on the lake. These rowers will generally be accompanied by a coach in a tinnie.

School Rowing Programs. Training sessions for school programs vary and a number of school rowing programs row in the morning from 6am to 7.30am. A number of schools also train in the afternoon from 3.00 to 5.30pm. On weekends key times for training are in the morning from 6 to 10am.

Competition. During the year Rowing ACT hosts a number of regattas, time trials and championship events with events occurring twice per month on average. These can occur on either a Saturday and/or Sunday running from 7am to 3.30pm. The majority of these Regattas take place on the rowing course on Yarramundi Reach between October and March. Several clubs and schools boat from their respective sheds on Regatta days so there is a large presence of boats moving all over the lake, between club sheds and the course. There are some boutique Regattas, Winter Time Trials, Twilight Regattas and National Time Trials that take place on other parts of the lake from June to December. The Rowing ACT rowing and event program is subject to change each year as interest in the sport builds.

Training Camps. Training camps for the ACT rowing community and interstate clubs, schools and national teams are run several times per year prior to, and midway through, the summer season, particularly in January, with multiple on-water sessions in a day. Interstate clubs, schools and Interstate State and National Teams visit Canberra and LBG for training camps to take advantage of the size and rowing conditions on LBG.

Individual rowers. Timing for individual rowers training on LBG is ad hoc and linked to weather and water conditions. Experienced rowers will train on LBG without a coach present in a tinnie. If it was mandatory for all rowers to have a coach with them at all times, the impact on participation from recreational and competition rowers would be significant.

Impaired rowers. Another important user group are our para-rowers. Rowing ACT has a proud history of being able to offer opportunities for the para community including those with intellectual disabilities. Having seaplanes on LBG would make it prohibitive for some of these members of our community to continue to utilise the lake.

Rowing traffic flows and safety conventions. Rowing ACT works to the Lake Traffic Flow guidelines provided by the NCA. Rowing ACT has, in recent years, maintained records of lake safety incidents. There is a pattern of safety incidents involving collisions and near misses in the vicinity of West Basin and proximity to Yarralumla Bay due to the large number of rowers in these areas.

It should be noted that individual clubs and schools are responsible for the safety of rowers in their communities as they are all community organisations and responsible for safety

under the WHS Act. Rowing ACT provides safety guidelines for the community and manages safety for its employees and the ACT High Performance Program.

- Further detail on ACT rowing community lake usage is available and Rowing ACT would welcome a detailed discussion with the NCA.

Rowing ACT Concerns

Sea-Plane Operations

The discussion paper does not outline how the operations of the sea plane will occur. How would variations in operations eg. change of flight path, change in flight times etc be communicated with the lake users? What is the impact of seaplane operations on Rowing ACT events? Would commercial operators eg seaplanes be given priority use over rowing events?

- Should seaplanes be approved on LBG, Rowing ACT seeks that a shared operation manual be developed so that all lake users, seaplane operators and other stakeholders fully understand their roles and responsibilities.

Flight Timings. Rowing ACT is concerned that the proposed timings of the sea plane take-off and landing occur during peak rowing activities. This is a key safety concern for the rowing community.

Proposed Take-off and Landing locations. The proposed landing and take-off locations are in a key part of the lake for a large portion of the ACT rowing community. Of note, the use of West Lakes for take-off and landing would directly impede ANU Boat Club operations as this area is their access point to all parts of LBG. Equally the proposed seaplane take-off and landing locations would be in close proximity to the beginner, novice and school rowing populations as West Lakes is used regularly due to the shelter and calmer waters from prevailing wind conditions. There is both a real and perceived risk associated with seaplanes landing near school children and novice rowers which may impact the schools' ability to offer rowing programs or clubs offering learn to row programs.

Lack of Detail on Proposed Operations. Whilst the NCA discussion paper provides broad concepts for seaplane operations it is unclear how proposed operation might impact the ACT rowing community lake usage. It is also noted that the seaplane demonstration in February 2021 did not use the same type of aircraft that is proposed for future use. Rowing ACT has identified that there are outstanding questions regarding seaplane wash on take-off, landing and movement to proposed mooring points as well as noise, updraft and wash impact on lake walls that require detailed review and assessment. These issues require a detailed assessment with particular attention to matters of safety and control measures. At the moment there is very little oversight, deconfliction and management of safety on LBG. This is already a problem for rowers. There is concern that the increased lake usage from seaplanes, coupled with other commercial and private lake users will increase safety risks for all lake users.

- Rowing ACT seeks a more comprehensive assessment of lake impact on all proposed seaplane models including detailed usage and safety considerations prior to any decision being made on seaplanes.
- Rowing ACT seeks an assessment of seaplane wash and its impact on rowers
- Rowing ACT suggests that an assessment of seaplane wash on lake infrastructure and lake walls be considered, in particular choke points at the National Museum where wash dissipates slowly.
- Should the sea plane proposal proceed Rowing ACT seeks close consultation with the sea plane operators to better understand proposed operations and the detailed safety management protocols.
- Rowing ACT notes that any seaplane operator would currently need to have multiple agreements with individual clubs and schools to manage safety as there is no central management authority.

Lake Safety

It is unclear how lake safety will be managed with the increased commercial and community use of LBG. As LBG is under a Lake Ordinance it is unclear what Maritime Safety law and rules would apply for the seaplane. Rowing ACT, rowing clubs and schools all have responsibilities under the WHS Act to manage safety for their respective members (and employees where appropriate) as they are registered organisations in the ACT. There is currently no guidance around the safety responsibilities of the seaplane. For example, when a pilot lands a plane, who is responsible to ensure the landing area (including safety perimeter) is clear of any persons at that time. If there was an accident, who would be responsible? Whilst a workplace incident involving a rower and the seaplane is considered low, it is still possible, and the consequences are potentially catastrophic. Furthermore, insurance coverage must also be considered, and an increase in insurance premiums to cover an incident involving the seaplane would be concerning to the ACT rowing community.

- Rowing ACT seeks a detailed safety management plan for future seaplane operations that is developed in consultation with lake users including the ACT rowing community.
- Rowing ACT seeks that other commercial lake users be included in a LBG safety management plan to ensure that all aspects of safety are considered in a comprehensive approach.
- Should seaplanes be approved on LBG Rowing ACT seeks a detailed community engagement, education and awareness program.

General Comments

We acknowledge that LBG is a valuable asset to the Canberra and it should continue to be available for public use. Rowers are proud of our lake and its value to the ACT community. We have observed that there is increased use of LBG by commercial ventures including ferries, tourist boats, GoBoats, the Black Mountain Water Park and now the potential Seaplane. There is also increased use by the community including rowers, yachts, dragon

boats, SUP, kayakers, triathlon and individual ad hoc users. Whilst Rowing ACT sees the value in increased usage of LBG, we believe there is a strong need to develop a Lake Use Strategy as part of consideration for the seaplane. The Lake Use Strategy should consider the future use for LBG and its shores to ensure that there is an understanding of, and future planning for:

- regulatory considerations
- safety for users
- commercial use
- community use
- heritage and environmental management
- infrastructure management - moorings, pontoons, training courses, lake walls etc.

Such a strategy would prove a valuable document for all lake users in ensuring that, as the lake continues to grow as an important asset to the ACT community, such growth is done in a way that is respectful of the right of all lake users to enjoy the lake, whilst acknowledging that a collaborative approach between lake users is required.

- *Regulatory aspects including Lake Safety and Lake Ordinance.* It is unclear how lake safety will be managed with the increased commercial and community use of LBG. As LBG is under a Lake Ordinance it is unclear what Maritime Safety law and rules would apply for the seaplane. RA, Rowing ACT, rowing clubs and schools all have responsibilities under the WHS Act to manage safety for their respective members as they are registered organisations in the ACT. We believe that clear guidance needs to be provided on the safety responsibilities of the seaplane. Also, a clear understanding should be provided around lake safety management and if possible provision of a Lake Safety Management Plan. As detail on seaplane operations was not provided in the Discussion Paper it is not possible for safety implication to be fully evaluated.

Such a safety plan should include the possible risk associated with fuel spills with an understanding of how a fuel spill would be managed as water quality is an ongoing issue for all lake users including rowers.

- *Mooring location.* Rowing ACT understands that the long term intent for seaplane mooring is planned for Acton or Lotus Bay. It is noted that the infrastructure for appropriate mooring is not yet available in these locations. The Yarralumla Bay mooring was used for the demonstration. It should be noted that Yarralumla Bay has the highest number of rowing clubs and boat sheds with a very high number of rowers using the areas around Yarralumla Bay on a daily basis and throughout the day. As a result of this high usage there is increased risk with near misses or collisions between rowers. Rowing ACT works with clubs and schools to monitor incidents and then works with NCA to implement control measures to mitigate these collisions. We consider that mooring the seaplane at, or in proximity to Yarralumla Bay would increase the safety risk to our rowers and Rowing ACT has concerns

that a Yarralumla Bay mooring may be considered as a temporary or contingency site for mooring the seaplane. This is of real concern to our organisation.

- *Rowing Australia and Rowing ACT Safety Responsibilities.* Both organisations have a number of employees (high performance rowers, coaches and support staff) who use Lake Burley Griffin as their primary place of work. This means that LBG is considered an industrial workplace. It is the responsibility of both our organisations to create a safe environment for our employees and detailed risk assessments are underway to identify the risk and appropriate mitigations to manage the risk. While a workplace incident involving a rower and the seaplane is considered unlikely, it is still possible and the consequences are potentially catastrophic. Insurance coverage must also be considered and an increase in insurance premiums to cover an incident involving the seaplane would be concerning to the ACT rowing community. These issues are of real concern to our organisations.

Final Comment

There is a real concern that if this proposal was to go ahead, the operation of seaplanes on LBG could expand overtime without any opportunity for public consultation. **Rowing ACT seeks assurance from the NCA that if seaplanes are approved for use on LBG that public consultation will occur for any changes from the original discussion paper.**

Rowing ACT welcomes the opportunity for continued engagement with the NCA and the seaplane operators to ensure that any potential seaplane operations on LBG are safe for all lake users, and considerate to the needs and operations of those already established lake users.