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COMMENTS ON MOORABBIN AIRPORT PRELIMINARY DRAFT MASTER PLAN 2009

Submitted by:

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1. SUMMARY

Port Phillip regional planning is deficient. Approval of the Master Plan should be deferred until the future of Essendon Airport is clarified and a further period allowed for public comment.

The Master Plan process dealing with public comments lacks fairness. Approval of the Master Plan should be deferred until the Section 79 of the Airports Act 1996 process is changed to enable effective community participation.

The community consultation process is lacking and steps must be taken as part of the Master Plan approval process to make consultation more effective and meaningful to affected communities.

The RPT proposal involving 3C/4C aircraft or similar, is a fundamental change not envisaged and is thus unfair to the surrounding community. The airport infrastructure is unsatisfactory and unsafe for such operations. Accordingly, this aspect should be withdrawn by the Minister in respect of the 2004 Master Plan and deleted by the Minister from the 2009 Master Plan.

In respect of ongoing aviation operations, certain measures must be taken to safeguard the airport. As proven by a recent event at Moorabbin, ab initio flying training has become unsafe and high volume circuit training over residential areas is no longer environmentally acceptable. To support future growth, these types of operations should be phased out at Moorabbin. Flight path dispersal measures as proposed in the national Aviation Policy Green Paper must be taken. Turn restrictions should be clarified and enforced by regulation and certain objectionable recreational flying must be banned by regulation.

In respect of non-aviation infrastructure, the Airport must work harder to ameliorate the effect of unplanned development on road traffic in the area. In particular, to enable greater access from Chifley Park to Boundary Road, Federation Way should connect directly to Boundary Road.

2. MASTER PLAN PROCESS

There are two major concerns with the overall Master Plan process that require comment and placing before the Minister:

- i. *Lack of overall Port Phillip Region airspace consideration/future of Essendon Airport*

The very nature of the privatisation process involving disparate owners of airports has engendered a disconnected approach to regional airspace issues.

The concern here is that with a State Government supportive of closure of Essendon Airport, any planning activity at Moorabbin would be invalidated by such closure.

While the private owners of Moorabbin would welcome closure of Essendon and the new business that action would generate, affected residents would not, and would oppose closure of Essendon.

Those considering future plans at Moorabbin are entitled to certainty surrounding the future of Essendon Airport to make such consideration worthwhile.

Port Phillip regional planning is deficient. Approval of the Master Plan should be deferred until the future of Essendon Airport is clarified and a further period allowed for public comment.

- ii. *Section 79 of Airports Act 1996 Process/Process lacks meaning*

The method of processing of public comments is attributed to Section 79 of the Airports Act 1996 and is repeated in section 1.4 of the Master Plan.

This process does not instil any confidence that comments will be fairly dealt with as MAC is required inter alia to “demonstrate that MAC has had due regard to...comments in preparing the Master Plan”.

This is a subjective and self serving process as it is difficult to see how MAC could do other than reach conclusions that it had had due regard.

The concern is around the meaning of “due regard”. This could simply be achieved in relation to extremely specific issues by reference to very broad statements of principle contained in the Master Plan.

The process lacks any natural justice, as commenters have no idea of how their comments have been dealt with. From past experience of the process, comments are totally ignored and no feedback is provided. All of the issues raised in these comments were raised in 2004 and no change has been detected nor has any feedback been received from Airport management.

The process lacks meaning, as MAC is both poacher and gamekeeper. Otherwise MAC has a blank cheque and there is no point in making submissions and there is no redress for affected residents. The Minister must review this process for fairness and equity and this should be done before this Master Plan is approved.

The Master Plan process dealing with public comments lacks fairness. Approval of the Master Plan should be deferred until the Section 79 of the Airports Act 1996 process is changed to enable effective community participation.

3. ONGOING AIRPORT/COMMUNITY CONSULTATION

The existing consultation process is lacking and issues raised routinely with the Airport Manager are ignored. No feedback has been provided, including from the last (2004) Master Plan process.

Under formal arrangements, those who are actually affected by aircraft noise are under represented in favour of local and state government representatives.

The measures proposed in the National Aviation Policy Green Paper in respect of community consultation are supported and these should be imposed as an outcome of this Master Plan process.

The proposed steps will improve community consultation. Further steps should be taken to ensure greater participation by those actually living under flight paths and who are directly affected. While it is recognised that governments should participate, there should be less participation by local government representatives who participate purely on an ex-officio basis (maximum of one) and more (say up to three persons) by those from among those directly affected.

The community consultation process is lacking and steps must be taken as part of the Master Plan approval process to make consultation more effective and meaningful to affected communities.

4. AB INITIO FLYING AND CIRCUIT TRAINING ACTIVITY

In the context of air traffic management and environmental impacts on communities surrounding Moorabbin Airport, there can be no greater indicator of the current state of affairs than the incident that took place on 27 August 2008, when an aircraft collided with another and fell on a residential area.

It is clear from this event that air traffic around Moorabbin Airport has reached capacity.

A decisive and significant response to this event must be taken.

If general aviation operations at Moorabbin are to grow, then steps must be taken to reduce risks to residents, such as that described above. Accordingly it is submitted that ab initio flying from such airports must be phased out with restrictions being placed on air movement growth until cessation of ab initio flying is achieved.

Also from an environmental point of view, it has reached the stage when it is inappropriate for circuit training to continue above residential areas surrounding Moorabbin Airport, and to support facilitate growth in air traffic movements, such circuit training must be phased out. Again, until this can be achieved, restrictions must be placed on air movement growth.

Phased out operations should be transferred to regional airports.

As proven by a recent event at Moorabbin, ab initio flying training has become unsafe and high volume circuit training over residential areas is no longer environmentally acceptable. To support future growth, these types of operations should be phased out at Moorabbin.

5. INTRODUCTION OF HIGH CAPACITY JET RPT USING CODE 3C/4C AIRCRAFT

i. Change in character of airport operations

Moorabbin Airport has always been principally used for light aviation and some low capacity RPT. We now have a situation where privatisation is driving development aspirations that will change the character of operations fundamentally. When residents purchased in the area, they relied upon the current scope and usage of the airport.

It is therefore entirely inappropriate and unfair to residents to contemplate a change the character of the airport to one of high capacity jet traffic potentially involving some 34 movements per day.

The type of aircraft indicated is typically used overseas but from major protected airports. It is not appropriate to introduce such aircraft at Moorabbin, which is surrounded by residential areas.

ii. Use of Runways 13/31 for Jet RPT

The use of runways 31 (L or C) is inappropriate for jet RPT aircraft movements of potentially some 34 per day. These runway points more closely to residential areas and the current turn issues so heavily affecting residents to the north and west of the airport [SEE LATER...] will inevitably arise from RPT operations.

In places in the Master Plan, runways 17/35 are mentioned as the preferred runways, inter alia providing some protection for residents. However, the RPT proposal, for more intrusive and noisy operations, involves use of a non-preferred and extended runway.

iii. Proposed Public Safety Zones (PSZs) will be infringed

Use of Runway 31 from its extended northern end will infringe PSZs currently being proposed by the federal government. Even a generic PSZ for light aircraft operations would be 1,000 metres in length. For jet RPT operations this zone should be longer due to faster take off speeds. A 1,000 metre zone would encroach on playing fields and if longer would encroach on residential areas.

While PSZs are a safeguarding issue principally directed towards greenfield airport operations to prevent encroachment, it is difficult to see why a completely new phase of operations should be allowed in such circumstances.

The RPT proposal involving 3C/4C aircraft or similar, is a fundamental change not envisaged and is thus unfair to the surrounding community. The airport infrastructure is unsatisfactory and unsafe for such operations. Accordingly, this aspect should be withdrawn by the Minister in respect of the 2004 Master Plan and deleted by the Minister from the 2009 Master Plan.

6. NOISE ABATEMENT PROCEDURES/FLIGHT PATHS

i. General Comment

It is of concern that the Master Plan gives no recognition of the noise abatement and community consideration mindset contained with the National Aviation Policy Green Paper. It sticks with the same old, ineffective arrangements.

ii. Dispersal of flight paths

The proposals in the Green Paper to provide a holistic approach to, and greater dispersal of flight paths and this are fully supported as well as steps to address the impact of noisy aircraft. These matters should be included within the Master Plan and imposed by regulation.

While it is recognised that flight paths are not precise, it has reached a stage at Moorabbin where, to enable continued growth in air traffic, solutions will need to be found to enable more precision for the benefit of residents, to avoid overflight of residential areas.

iii. Turn Restrictions

Pilots, including those involved in circuit training, routinely ignore turn restrictions to the north. Turns are made soon after becoming airborne, rather than waiting until Kingston Centre is reached. This results in hard and noisy climbing over residences east of Warrigal Road and south of Centre Dandenong Road.

The Master Plan and other references are unclear as to whether, in all daytime circumstances, the northerly turn restriction described above (not until Kingston Centre is reached) applies to both Runways 31 and 35 or just Runway 35. Section 7.4.2 clearly refers only to Runway 31L yet Section 7.3.1 only refers to Runway 35 L. Section 7.5.2 refers to 13 (sic)L which appears to be inconsistent with northerly turn restrictions-perhaps this should read "31L".

The MAC website refers only to the northerly turn restriction in relation to Runway 35L.

If the northerly turn restriction (not until Kingston Centre is reached) does not currently apply to both Runway 31L and 35 L it should do so, as the same noise intrusion applies to residents west of the airport as it does for residents to the north-west. This is particularly so as residents here bear the brunt of helicopter arrivals from and departures to the west. While the restriction should apply application to Runway 31L, if it does not apply to Runway 31L, it simply shows a track for all pilots to follow, including those taking off from Runway 35L and thus

the benefit of the restriction is cancelled, which is probably what is causing the wholesale breach of the requirement.

iv. Enforceability of turn restrictions

Also, the enforceability of these restrictions should also be clarified. In some instances they are represented as “requests” and in others, as “requirements”. In section 7.3.1, “aircraftare “requested”. In 7.4.2, “aircraft.....are required” and in 7.5.2, “aircraft....are required” (see above re possible typographical error). On the MAC website, it is in the form of a request.

The application of these turn restrictions should be clearly stated in the Master Plan. Until this has been clarified, the Master Plan is deficient and it is difficult for residents to make comment in these circumstances. Accordingly, the comment period should be extended until this has been clarified and time for further comment to be allowed,

The stage has been reached where, in terms of the National Aviation Policy Green Paper, a holistic approach must be given to flight paths that may not allow the most direct path dictated by emission or fuel cost impacts. As restrictions such as those described above cannot be imposed by request, the time has come for imposition by regulation, and this should be placed before the Minister for consideration.

v. Objectionable Flying Activities

At Moorabbin, it has reached the stage where certain recreational flying activities causing disamenity for local residents should be disallowed by regulation. It is not acceptable that such private leisure activities of a few be allowed to impact on local residents. These activities are described below:

- Formation flying. Formation flying produces noise and disamenity due to the concentration of several aircraft per pass. Steps should be taken to ban formation flying during takeoff/departure and approach/landing.
- All flying of war birds and other non-essential flying of noisy private aircraft should be phased out at the earliest opportunity.
- All aerobatic flying over the airport and its environs should be banned.

Flight path dispersal measures as proposed in the national Aviation Policy Green Paper must be taken. Turn restrictions should be clarified and enforced by regulation and certain objectionable recreational flying must be banned by regulation.

7. TRAFFIC IMPACTS OF NON-AVIATION AIRPORT INFRASTRUCTURE

Privatisation of Moorabbin Airport under the protection of Crown rights has resulted in significant disamenity to surrounding residential areas through the increase of heavy road traffic, over and above normal growth and impact of such traffic.

This has occurred because of unplanned growth of warehouse and distribution facilities around the airport. Due to the unplanned and ad-hoc nature of these developments, they have not been supported long term by development of appropriate road facilities by state and local governments.

One impact has been the huge increase in heavy haulage traffic along Centre Dandenong Road and through the intersection of Centre Dandenong Road and Warrigal Road. A great problem exists for southbound traffic turning left out of Warrigal Road into Centre Dandenong Road. Here traffic is forced through a small gap, producing much heated conflict with other traffic. It is hoped that discussions with Vic Roads mentioned in the Master Plan [WHERE] have proposed changes in this area.

It is extremely disappointing to note that the Master Plan does not provide for connection of Federation Way through to Boundary Road, rather, access to Boundary Road is proposed in an indirect way, via an extended Chifley Drive. It should be noted that amelioration of the traffic impact on Centre-Dandenong Road from the Airport was cited by VicRoads as a benefit of completion of the South Road Extension and ultimately of the Dingley By-Pass. Unless traffic can move directly to Boundary Road from Chifley Park, this benefit will not be achieved. Accordingly, direct access to Boundary Road should be provided for.

In respect of non-aviation infrastructure, the Airport must work harder to ameliorate the effect of unplanned development on road traffic in the area. In particular, to enable greater access from Chifley Park to Boundary Road, Federation Way should connect directly to Boundary Road.