

**Kelvin Thomson MP
Federal Member for Wills**

&

**Judy Maddigan MP
State Member for Essendon**

**Joint Submission to the Development of a *National
Aviation Policy Statement- White Paper***

**Department of Infrastructure, Transport, Regional
Development and Local Government**

February 2009

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1. Overview

We are making this submission to the development of Australia's first ever comprehensive *National Aviation Policy Statement, White Paper*, with regard to Essendon Airport which is located in our electorates.

In his letter dated 9th December 2008, the Minister for Infrastructure, Transport, Regional Development and Local Government, The Hon Anthony Albanese MP (2008), stated the *White Paper* will bring all aspects of aviation, with the aim of providing greater planning and investment certainty for the industry, maintaining and improving Australia's excellent aviation safety record and addressing the wider community and environmental impacts of air transport and air development.

As the *National Aviation Policy Statement* intends to outline future policy for Australia's aviation sector, we are making this submission to ensure issues associated with ongoing aviation operations at Essendon Airport are considered and addressed.

We made a joint submission in March 2008 in response to the *Essendon Airport Preliminary Draft Master Plan*, which set out a number of proposals by Essendon Airport (EAPL 2007) in relation to developments, initiatives and projects it intends to undertake over the next five years. Our submission identified a number of issues associated with several proposals contained in the *Draft Plan*.

The Draft Master Plan included the provision of new aircraft hangars along the North-South and East-West Runways, the upgrading of existing and construction of new hangars and the possibility of a light aircraft parking area near the water tanks (EAPL 2007). These plans to intensify aviation activity were; and continue to be out of step with the views of the local community, who are in favour of aviation being relocated from Essendon Airport to a more suitable location.

Essendon Airport (2007) was established in the 1920s. It was Melbourne's main airport until the opening of Tullamarine Airport in 1970, which saw international flights relocated, followed by domestic flights in 1971.

It was initially established after the Federal Government bought 36.8 hectares of land, then known as St Johns, for aviation activities. Another 36.5ha was added 14 years later, notably part of Bulla Road and an area to the west in Keilor in 1938.

The Airport's first tenant was J H Larkin in December 1921. It was used by many aviation pioneers and welcomed many international visitors and distinguished guests (Carman 2001).

Essendon Airport (2008) was also used as a defence facility during the Second World War.

In 1996 the Federal Department of Transport recommended Essendon Airport's closure. But the then Transport Minister, The Hon John Sharp MP, determined that the Airport would stay open and that it would be sold to private operators (Carman 2001).

In 1998 Essendon Airport Pty Ltd (EAPL) (2007:14) was granted a 50 year lease with a 49 year option. Control of Essendon Airport Pty Ltd was transferred to a joint venture of the Linfox and Becton Groups in September 2001. In 2005, the Becton Group transferred its interest to Beck Corporation. At the same time the 305 hectare site, 11 kilometres from the Melbourne CBD was valued between \$70 million and \$100 million (Davidson 2008).

The Lease Agreement between the Commonwealth and EAPL states that throughout the term of the lease, the Lessee must develop the Airport Site at its own cost and expense, having regard to the actual and anticipated future growth in traffic demand for the Airport site (Commonwealth 1998:12)

Prior to drafting our submission, we asked residents to contact us with their thoughts and feedback regarding the proposals being put forward by EAPL. Our offices received a combined total of over 400 hundred letters, phone calls and emails expressing concerns for the proposed intensification of aviation operations. Residents were firmly in favour of aviation operations being phased out and relocated to more suitable airfields.

We had also previously arranged two community meetings regarding this issue. The public meetings, held with EAPL also in attendance, attracted a combined total of over 150 people. The first public meeting was held on the 7th March at Boeing Reserve Strathmore 2007 with the second being held on the 28th June 2007 at the Essendon Airport Terminal. Residents in attendance at both meetings expressed significant concern about aircraft movements, noise, air quality, curfew, planning controls and motor vehicle traffic accessing the airport.

Our joint submission incorporated the vast amount of feedback we received. We put forward eleven recommendations that EAPL and the Department of Infrastructure and Transport were asked to consider and implement.

We put forward recommendations for general aviation and corporate jet aircraft to be relocated. Our joint submission argued that the site is well past its use by date as an Airport. The proposals in its recent *Master Plan* to intensify aviation activity are out of step with both the local community's wishes and the changes which have happened and continue to happen both on and off the site.

We also forwarded submissions to the *National Aviation Policy Review; Green Paper*. Our submissions recommended that future aviation policy incorporate the phasing out and relocation of aircraft from Essendon Airport to more suitable airfields and airports that are expanding to cater for growing aircraft movements.

The submissions outlined issues associated with air quality emanating from the Airport, noise, curfew, commercial development and planning, and the financial benefits associated with phasing aircraft out from the site.

On the 31st October Minister Albanese (2008A) announced that he had approved the Essendon Airport *Master Plan*. As part of the approval, Minister Albanese instructed Essendon Airport Pty Ltd to establish a Working Group to examine and report on the impact of aircraft movements and how aircraft noise can be better managed.

We were disappointed at the Government's decision to approve the Essendon Airport *Draft Master Plan*. The *Draft Master Plan* public feedback process received approximately 180 submissions, 80% of which we understand called for the relocation of aircraft from Essendon. As part of the approval however we are pleased the Minister has listened to the local community through the public feedback process and announced new measures designed to assist residents in minimising disturbances caused by ongoing aviation activities (Thomson 2008A).

As part of the approval process, the Minister has announced there are no plans to relax the existing curfew arrangements. A Ministerial Working Group has been established with members including EAPL, Air Services Australia, the Department of Infrastructure and Transport.

The Working Group has met several times and is investigating practical ways to reduce the noise and other impacts with targeted strategies. We are scheduled to report to the Minister by April 2009 on:

- Ways to better manage and monitor the aviation noise impacts at Essendon Airport;
- The most effective options to reduce the noise impact on nearby residents, while maintaining the viability of Essendon Airport, including:
 - analysing the current aircraft mix, which aircraft generate noise of most concern to nearby residents and exploring whether the mix might be altered to reduce the community impact;
 - analysing whether runway usage might be altered to reduce noise impacts;
 - better management of Fly Neighbourly flight paths and noise abatement zones;
 - identifying specific noise buffer zones and techniques to better shield local residences from airport operations; and
 - the establishment of an airport operated community consultation committee for ongoing dialogue on airport issues, including on-airport developments and noise management (Albanese 2008A).

This submission aims to outline the issues associated with the decision to maintain aviation activities at Essendon which we encourage the Minister and the Department to consider as part of the process in formulating the *National Aviation Policy White Paper*.

2. Executive Summary

Minister Albanese (2008A) approved the Essendon Airport Master Plan in October 2008, citing the Airport's important role for supporting general aviation, emergency services and for regional aircraft as a key reason to maintaining the Airport open.

Despite the approval of the recent *Master Plan*, we are of the view that a long term national aviation policy must incorporate the phasing out and relocation of aircraft from Essendon Airport. The Ministerial Working Group will be forwarding the Minister a report containing recommendations on how several issues associated with ongoing aviation operations can be addressed. It is our view that the only way for noise, air quality and community safety issues to be fully tackled is through the relocation of aircraft from Essendon.

The *National Aviation White Paper* should consider recommendations that will be put forward in April by the Essendon Airport Ministerial Working Group.

The *Green Paper* has indicated that the Australian Government has no intention of altering the existing curfew at Essendon Airport. We support this position, and outline a method of strengthening the existing curfew in Section 4.4 of this submission. The existing curfew at Essendon Airport should be enforced, with no exemptions, between the hours of 11pm and 6am.

We also emphasise the importance of addressing the issue of aviation fumes that are being blown into residents homes and potentially compromising local health. As recommended in previous submissions, the Minister should consider commissioning an environmental and health impact study from the Department of Infrastructure and Transport in conjunction with the EPA, on aircraft fumes and their impact on resident health and the local environment.

Local residents deserve a say when it comes to having developments on airport land have the potential to take away their amenity and neighborhood livability. More stringent planning guidelines and consultation processes should be introduced. EAPL should adhere to the advice of the State Government and local Council with regard to any developments on site to ensure plans are consistent with local and state planning regulations.

In 2001 the Howard Government leased Essendon Airport to Linfox and Becton Groups for \$22 million. At the same time the 305 hectare site, 11 kilometres from the Melbourne CBD was valued between \$70 million and \$100 million (Davidson 2008).

Essendon Airport is not profitable as an Airport. It was leased in 2001 with restrictions on the type of aircraft accessing the site and hours of operations. It was not profitable then as an airport and as the current *Master Plan* outlines, it is still not profitable (Davidson 2008). We encourage the Australian Government to take the information and concerns raised in our submission into consideration in formulating the *National Aviation Policy White Paper*.

3. Findings of the Green Paper

The Australian Government's decision to develop an *Aviation White Paper* represents a milestone in planning for Australia's aviation future. It is the first attempt to bring all aspects of aviation policy together in a single forward-looking statement. After nearly a century of Australian aviation and several decades of significant changes in the commercial and regulatory environment of aviation business

worldwide, now is the time to give industry certainty and incentive to plan and invest for the long term for both local communities and the aviation sector (Department of Infrastructure, Transport & Regional Development 2008:8).

The Australian Government's recently released *Aviation Green Paper Statement* stated the Government is committed to working with industry and the community to develop a plan to support the safe, dynamic and sustainable development of the aviation industry into the future (Department of Infrastructure, Transport & Regional Development 2008:8)

The policy direction outlined in the *Aviation Green Paper Statement* must consider the issues associated with ongoing aviation operations at Essendon Airport. Just as the aviation sector requires certainty to plan and prepare for the future, so do our constituents in the electorates of Wills, Essendon and surrounding communities.

The *Aviation Green Paper Statement* has indicated the Government has no plans to relax the existing curfew arrangements that are in place throughout the countries airports, including Essendon (Department of Infrastructure, Transport & Regional Development 2008: 21,34,192 & 198).

Aside from these references to Essendon Airport, the *Green Paper* does not specify any other issues associated with Essendon Airport. It is noted the Minister has established a Working Group following the *Master Plan* approval to investigate and report back on various issues raised by residents during the *Draft Master Plan* feedback process.

The final *Aviation White Paper* Document should consider the feedback received not just in the form of this submission, but the previous submissions we and hundreds of others within the community have made about Essendon Airport.

4. Issues associated with Essendon Airport

Minister Albanese (2008A) approved the Essendon Airport Master Plan in October 2008, citing the Airport's important role for supporting general aviation, emergency services and for regional aircraft as a key reason for keeping the Airport open.

Despite the approval of the recent *Master Plan*, we are of the view that a long term national aviation policy must incorporate the phasing out and relocation of aircraft from Essendon Airport. The Ministerial Working Group will be forwarding the Minister a report containing recommendations on how several issues associated with ongoing aviation operations can be addressed. It is our view that the only way for noise, air quality and community safety issues to be tackled is through the relocation of aircraft from Essendon.

The discussion questions raised in the *Green Paper*, as was the case in the original *National Aviation Statement Discussion Paper*, relating to community safety, promoting dialogue between airports and communities, tackling climate change, airport regulations and noise, are all issues that relate directly to Essendon Airport.

Essendon Airport is surrounded by built up, long established residential communities from all sides and flight approaches and take offs. It has a history, which is discussed in detail in Section 4.1 of this submission, of aircraft accidents, in particular light aircraft, which have claimed lives.

Unless effective measures are implemented, ongoing aviation operations will continue to exacerbate noise and air quality issues amongst the local community. Since the approval of the Master Plan, our offices have been contacted by many residents stating they have noticed an increase in aircraft movements, noise and fumes, particularly from non emergency service helicopters.

There has also been a great deal of concern raised from local residents about commercial developments that are taking place on Airport land. Residents are not satisfied with the public feedback opportunity provided to them through the current *Master Plan* process, as buildings have been constructed that have not been clearly identified and proposed in previous airport *Master Plans*. Appropriate planning controls and objection processes must be considered as part of future aviation policy.

4.1 Aviation Operations and Community Safety

Local community safety must be at the forefront of future decisions regarding Essendon Airport.

Ensuring safety at airports across the country is maintained to the highest possible standard, is of the utmost importance. This is particularly the case at Essendon Airport, due to not only its history of accidents but also because of the extremely close vicinity of homes to the Airport's runways, flight paths and aircraft infrastructure.

Essendon Airport is surrounded on all sides by heavily developed residential areas. Aircraft taking off and landing from both the North-South and East West Runways fly close to homes under these flight paths. A map that illustrates the closeness of homes to the Airport, with back fences literally bordering onto the site, is contained in the *Draft Master Plan* (EAPL 2007:18).

Feedback received from residents during the *Draft Master Plan* public comment process also demonstrates just how close aircraft fly over homes when accessing the Airport.

The accidents and incidents that have occurred over the years at Essendon remind us of the need to ensure resident safety is the first priority when planning the future of the Airport. Essendon has inadequate safety buffer zones to give aircraft runoff space from runways in the event of an emergency.

The worst accident associated with the Airport occurred on July 10 1978, when a Partenavia aircraft became airborne from the North South Runway and climbed to a height of 200 to 250 feet. Co-incident with the raising of the wing flaps from take off position and a simulated failure of one engine, the aircraft assumed a nose down attitude and continued straight ahead on a descending flight path (Department of Transport 1979:1).

The aircraft crashed into houses 286 metres beyond the western end of the Runway. Six people of an entire family on the ground were killed, one person received minor injuries. The aircraft was destroyed and the three plane occupants were seriously injured (Department of Transport 1979:1 & Carman 2001).

On 3 September 1986 six people died when an air ambulance (Cessna 402) crashed after taking off from Essendon Airport (Air Ambulance- accessed 2008). Five of the dead were patients. The flight was intended to return patients to their home area following medical treatment in Melbourne. In response to a query from the Airport's control tower, the pilot advised that the left engine had failed, that he was "feathering the propeller" and would return for landing.

The twin engine Cessna then plunged into a suburban field and burst into flames only minutes after taking off from the Airport. The plane lost power after climbing to about 160 metres, then crashed to the ground less than 20 metres from power lines. The pilot appeared to veer to avoid the 220,000 volt transmission lines in an attempt to land safely.

The plane slammed into the ground belly first, then bounced 10 metres before bursting into flames. It crashed in an agricultural paddock about 300 metres east of the Tullamarine Freeway and about 300 metres short of houses in Gladstone Park (Attorney General's Department 2006).

The land to the immediate north of Essendon Airport where the crash happened has since been heavily residentially developed, and is known as Gowanbrae.

Another serious crash occurred in December 1993 when a Hawker Air de Havilland struck power lines just after take-off on a scenic flight and then hit the roofs of four adjoining houses in one street before diving into the front yard of the next house (Carmen 2001).

There have been various other accidents and incidents throughout the lifetime of the airport. Civil Aviation Authority data shows that more than 200 infringements were issued in the last two years to aviators across the country, almost 400 since 2001, in relation to breaches of airworthiness directives and flying without proper maintenance checks. Most of these related to small aircraft, with major airlines only having received four (Masanauskas 2008).

Of the 381 air safety infringements issued by CASA, 174 involved breaches regarding small passenger aircraft, 105 related to personal recreation and 38 involving passenger conduct (Masanauskas 2008).

In March 2008 up to 3000 light aircraft were recalled and grounded around the country, including at Essendon Airport, because of risk of crash landing. This was due to potential fuel injection problems to all piston-engine planes, a problem which has recently caused 18 engine failures and one crash landing in the US (Bennett 2008).

An Australian Safety Bureau report shows the average age of Australia's piston engine small aircraft fleet rose by up to 10 years in the decade from 1995 (Creedy 2007A). The average age in this category in 2005 was 31 years (Creedy 2007). According to EAPL (2007:44) 42.2% of annual aircraft movements are made up of single piston flights and 18.4% are made up of twin piston.

The Australian Safety Bureau has warned this could mean some planes were no longer supported by the companies that manufactured them. The operators of these types of aircraft often operate with low profit margins that limit their capacity to acquire new or newer aircraft. Operators are therefore left with the option of maintaining ageing aircraft with only limited continuing airworthiness support from the manufacturer (Creedy 2007).

Despite the average age of this type of aircraft increasing, private pilots have been lobbying the aviation regulator to relax maintenance requirements for light aircraft. The Aircraft Owners and Pilots Association is concerned the increases in fuel and the introduction of the GST has harmed the industry's ability to buy parts, and is investigating ways to reduce unnecessary regulatory and maintenance requirements. They argue each pilot of their own aircraft with training should be able to 'self-maintain wherever possible' (Creedy 2007A).

This is of concern given the record light aircraft have not only at Essendon Airport, but across the country. Two years ago a pilot of a twin-engine Commanche aircraft was killed when it plunged into the sea off Northern NSW after what was reportedly a double engine failure. Two men were also seriously injured last year when their Cirrus SR22 light aircraft crashed in a paddock next to the M7 motorway in western Sydney after sending an emergency message (Creedy 2007A).

More recently last year a trainee pilot in a Cessna 150 on his first solo flight was killed when his plane clipped another aircraft and plunged into a suburban street while accessing Moorabin Airport, narrowly missing a local primary school. The plane crashed into a garage in the backyard of a four-unit block. Both aircraft involved in the accidents had been in service for more than 30 years (Herald Sun 2008).

On December 10 2007 a Cessna Aircraft entered the North-South Runway at Essendon Airport, without an air traffic control clearance. At that time a Piper Aircraft was on final approach and had been cleared to land on the same Runway. In order to maintain separation between the two aircraft, the control tower sent the Piper around because of the unauthorised entry by the Cessna onto the runway (Australian Transport Safety Bureau 2008).

To ensure that safety is of the highest priority for the community surrounding Essendon Airport, future long term aviation policy should incorporate the phasing out and relocation of aircraft.

Recommendation 1: The Australian Government's *National Aviation Policy Statement- White Paper* should incorporate the phasing out and relocation of aircraft from Essendon Airport to other more suitable airfields.

4.2 Noise

Many residents believe that over recent times noise levels have significantly increased, with aircraft being relocated closer to residential properties following the commercial development of the land where they were once located.

This is particularly the case with the recent construction of the new hangars and base for the police and emergency service air wing at Essendon Airport. This facility was constructed with no public feedback or consultation, with residents now literally having a helipad situated in their backyards.

As illustrated in our joint submission, many residents have expressed concern over noise generated from the Essendon Airport. Any intensification of aircraft activity would increase noise levels. Increases in noise may have adverse health consequences.

We have received an overwhelming amount of public feedback regarding noise emanating from aviation operations at Essendon. The following statements outline concern that local residents expressed regarding the Master Plan;

Mr & Mrs Roberts of Strathmore state;

“Corporate jets are not completely silent; therefore any increase in air traffic will be an increase in noise levels and disturbances in and around our homes”

Mr Caputo of Strathmore states;

“...considering that from 6am in the morning and until late evening the sound of Jet aircrafts taking off shake the house so severely that it is frightening”.

Mr Giordano of Strathmore states;

“The increase in aircraft movements will also increase noise and pollution that are already major disturbances and health concerns”.

A European study that involved 140 volunteers, living either near London’s Heathrow Airport or one of the three other major European Airports, found they had significantly higher levels of blood pressure.

Participants were fitted with a blood pressure monitor, and noise levels were measured in their bedrooms at night. In all participants blood pressure significantly increased after noise even greater than 35 decibels, such as a plane flying overhead, was registered. This effect could be seen even if the person remained asleep, and the louder the noise, the greater the blood pressure. Given that high blood pressure can lead to heart disease, stroke, kidney disease and dementia, it is important that all possible measures are taken to reduce noise generated from aircraft accessing Essendon Airport, particularly in the evenings (White 2008).

A three country study on the effect aircraft and traffic noise have on young children, found that aircraft noise significantly affected reading comprehension and some aspects of memory. The reason aircraft noise was found to be harmful was due to its intensity and interrupting nature (Swan 2005).

Prolonged exposure to aircraft noise for young children can result in children not doing as well on difficult tasks, like reading, problem solving and memory, when compared to children in quiet areas. A reason for this is thought to be that prolonged noise exposure can raise the levels of cortisol. This can have significant effects on body functions (Western Australian Government (Accessed 2008:5).

Given the number of young children living in and attending local schools, such as Strathmore North Primary School, in the immediate vicinity of Essendon Airport, this is of concern.

Aircraft noise in the evening may change sleep state, and thus lower quality of sleep. It may also contribute to heart disease, further disturb individuals with existing mental illness and may reduce the effectiveness of the immune system (Western Australian Government (Accessed 2008:6).

Recommendation 2: The Essendon Airport Ministerial Working Group’s recommendations regarding minimising noise should be considered as part of the Australian Government’s *National Aviation Policy Statement- White Paper*.

4.3 Helicopter Movements

In preparing our submission to the Essendon Airport *Draft Master Plan* and the *National Aviation Policy Review* , we received a great deal of correspondence from residents regarding the movement of helicopters and emergency service aircraft.

The Victorian Government's Melbourne 2030 plan states that in the medium term, Essendon Airport should be closed and transformed into a significant employment and residential precinct. The Victorian Government (2008:4.3) recently announced the construction of a new Essendon Airport based Emergency Services Air Wing Centre (EAPL 2007:81).

The Civil Aviation Orders (1988) state helicopters are exempt from provisions in the Civil Aviation Regulations 1988 pertaining to flight paths and landings.

The Civil Aviation Regulations (1988) state that the pilot in command of an aircraft must not fly the aircraft over any city, town or populous area at a height lower than 1,000 feet or any other area at a height lower than 500 feet.

The Regulations exempt the pilot of an aircraft engaged in a search, rescue, the dropping of supplies, or an aircraft operated by the Federal Police or police of a State or Territory engaged in law enforcement operations.

Currently at Essendon Airport, emergency service helicopters are permitted to operate around the clock (*Air Navigation Regulations 2001*). We understand that both the Victorian Police and Air Ambulance Helicopters have in recent times adopted more 'fly neighbourly' flights paths to minimise disturbances on residents where possible.

We are however concerned at the increase in the number of commercial and private helicopters accessing Essendon Airport. Following the approval of the *Master Plan*, we have been contacted by residents complaining about the increases in noise, disturbances and fumes emanating from Essendon Airport as a result of the private helicopters.

Non-emergency service helicopters should be made to follow 'fly neighbourly' flight paths. We have also received feedback regarding movements of non-emergency service helicopters during the curfew period.

Helicopter flights in World Heritage Areas in Australia, specifically Great Barrier Marine Park, Tasmanian Wilderness, Kakadu National Park, Uluru-Kata Tjuta National Park and the Blue Mountains, have what is referred to as a 'Fly Neighbourly' Agreement with aircraft relating to sensitive areas of the Parks. These agreements are voluntary codes of practice which ask aircraft to fly above certain elevations except in specific routes and keep a minimum horizontal distance from important areas (Commonwealth Parliamentary Library 2008).

The 'Fly Neighbourly' Agreement is intended to protect both wilderness values and amenity for visitors and residents. A similar Agreement also exists at the Moorabin Training Area, Grampians National Park, and Port Campbell areas.

Mr Ferns of Strathmore states;

"My particular concern is the number of helicopters now operating out of the airport. They are very noisy. In particular some smaller ones which seem to be engaged in some sort of hover training often fly out to a distance of less than one kilometre...then hover in a stationary fashion for lengthy periods over residential areas...early in the day just after 6am by my clock".

Mr Murphy from Strathaird Street in Strathmore states;

"I have fumes from the airport constantly in my home...also add to this helicopters flying low over the house at all hours of the day and night".

The Ministerial Working Group is currently investigating options that could be implemented to minimise noise disturbances for residents. We encourage the Government to consider the options that are scheduled to be forwarded to the Minister in April.

We particularly emphasise the need for a future *National Aviation Policy* to consider the impact that the increase in private owned helicopters is having on the surrounding communities of Essendon Airport. These aircraft must be made to adopt 'fly neighbourly' approaches and take offs in order to minimise their impact on residents.

Recommendation 3: The Essendon Airport Ministerial Working Group's recommendations due in April, regarding minimising noise and disturbances emanating specifically from helicopter operations, should be considered in the context of the Australian Government's *National Aviation Policy Statement- White Paper*.

4.4 Curfew

Aircraft movements are not permitted at Essendon Airport between the hours of 11pm and 6am, except for propeller-driven aircraft with a maximum take off weight (MTOW) not exceeding 8,618 kilograms, unless the specific aircraft or aircraft type has been included in a Prohibited Aircraft Schedule.

Exception is also granted to propeller driven aircraft with a MTOW exceeding 8,618 kilograms that have noise emissions which do not exceed 90 EPNdB on take off and 95 EPNdB on approach.

Helicopters that comply with relevant noise levels, aircraft involved in an emergency, and the police air wing are also exempt (*Air Navigation Regulations 2001*).

EAPL (2007:43) says the existing curfew will prevent it from meeting the demand of the corporate jet market. The *Draft Plan* does not specifically propose any changes to the existing curfew arrangement but the issue is of great concern to residents.

Under no circumstances should the curfew be weakened or watered down. Indeed the present arrangements should be strengthened.

The existing curfew arrangements are ineffective as exempt aircraft still cause disturbances for residents. In preparing our submissions to the Draft Master Plan and Aviation Policy Review, we received a great deal of feedback expressing concern about the current curfew arrangements.

Mrs Williams of Strathmore states;

The community does not want or need changes to the curfew unless of course it was made longer! Aircraft are now warming up, taking off and landing during the curfew time. There is nowhere to report this locally and quickly. A large fine would be appropriate if this curfew is broken...

Mr Trengove states;

"I believe the laws for an airport should include a curfew similar to that of say lawn mowers. I am confident you would complain if my lawn mower started outside your bedroom window at 6am every day".

Mr Mlinar opposes any changes to the curfew;

"If Essendon Airport is looking to expand, then you would assume they are looking at increasing the volume of aircraft activity and extending the operating hours. How would this benefit the community?"

Mr & Mrs Goodwin of Strathmore state;

"We are writing to lodge a formal objection to...the allowance of the airport to be open 24hours daily..."

Ms Allen states;

"It has been mooted that small and large jets will be allowed to use the airport 24 hours a day. In a built up residential area, this will create untenable noise problems"

Michael Murdoch of Strathmore states;

"The concept of more noise, from increased air traffic, over 24 hours is deplorable..."

In terms of curfew hours, other Airports around Australia currently have 11pm-6am curfews.

As part of a process to phase aircraft out of the site and improve the lives of local residents, the curfew should be enforced for all aircraft between the hours of 11pm and 6am, with no exemptions.

Recommendation 4: The existing curfew at Essendon Airport should be enforced, with no exemptions, between the hours of 11pm and 6am.

4.5 Air Quality

As outlined in our submissions to the *Draft Master Plan* and *National Aviation Policy Review*, EAPL's (2007:35) Environment Strategy outlined in its *Draft Master Plan* predominantly takes into consideration the impact of construction on the site on air quality and on water runoff into local waterways, including Moonee Ponds Creek.

The *Draft Master Plan* fails to consider the impact aircraft fumes have on air quality and on resident health. Many residents believe increases in fuel residue from the Airport could be affecting their health (Brown 2008). There has been a great deal of feedback regarding this issue.

Mr Murphy of Strathaird Street states;

"I have fumes from the airport constantly in my home from your aircraft. We are at the stage where we are unable to have our windows open because of the fumes of kerosene coming into the home, the smell at times is quite overpowering and it has made us feel ill on numerous occasions".

Mr Legudi states;

“...the resulting increase in pollution and smell from diesel fuel, which is already a problem, is a major health concern, and we may not know the impact before it is too late”.

Ms Arrowsmith states;

“I wish to place an objection to any further development close to existing housing due to the impact it would have on residents and their health”.

The Eleftheriadis Family states;

“We currently experience...strong fumes and dust from aircraft that fly by...I fear...the deterioration (of our) health”.

Ms Rust states;

“I have been staying at my parent’s home in Strathmore Heights, with my mother while my father has been in the hospital with respiratory problems...the strong smell of kerosene that comes from the airport daily...windows cannot be opened in the house because of the smell, this is a health concern which should be looked at”.

Mr Ian and Judy Woods said;

“Basically we can’t open windows or doors and leave them open because the residue of fumes is so strong in smell...”

Many residents who have contacted us believe there is a correlation between the intensification of aviation activities towards the northern end of the North-South Runway and the increase in noise and fumes. Residents living in the immediate vicinity of the Airport have experienced an increase in fuel residue drifting from the Airport into their homes, and fear that it could be negatively affecting their health (Brown 2008).

It is currently unclear to the local community who exactly is responsible for monitoring fumes emanating from the Airport land. In previous representations we have made to the EPA, we have been advised to contact the Federal Department of Transport. Having done so, we have been advised the monitoring of air quality is the responsibility of the local Environment Protection Agency. Resident health could potentially be at risk if current operations continue unmonitored and unregulated. Aviation policy must incorporate guidelines to protect residents from exposure to dangerous fumes.

At present, Nitrogen Oxides (NOx) emissions and particulate matter (PM) are deemed to be the principal aircraft pollutants for local air quality worldwide. Along with motor vehicle traffic around airports, aircraft exhaust fumes and emissions from ground service equipment and auxiliary power units appear to be the major contributors (Green Skies 2007).

According to the International Society of Doctors for the Environment (2002) most emissions that take place during aircraft flight do not directly expose humans to pollutants as the aircraft move in higher parts of the atmosphere. However there is pollution at ground level during take off, which residents in Strathmore raise concern about. Landing and ground running results in high concentrations of harmful gases and fine particles around airports.

According to a recent assessment by the European Commission, high concentration levels of particulate matter led to approximately 288 000 premature deaths in 2000 in the EU. In the same year high particulate matter levels were also found to have caused 83 000 serious cases of hospital admissions and 25 million respiratory medication use days (Green Skies 2007).

A Senate Inquiry in 2000 found exposure to fumes of lubricant oils used in small planes, caused health problems such as headaches, vomiting, breathing problems and even partial paralysis (ABC 2000).

Current regulations are unclear as to which body is responsible for monitoring and responding to complaints regarding aircraft fumes at Essendon Airport.

The Airports (Environment Protection Regulations (Cth) set out standards for air quality in Part 1 of Schedule 1, and these apply at Essendon Airport. The Air Navigation (Aircraft Engine Emissions) Regulations (Cth) have the effect of applying the emission standards set out in volume 2 of Annex 16 to the Chicago Convention to aircraft operating to or from Essendon. These standards are not administered by the Environment Protection Authority.

A future aviation policy should consider a single body to monitor and respond to air quality complaints at Essendon Airport and other federally leased Airports.

With aviation activity scheduled to continue in light of the recent Ministerial decision, residents may be faced with an increased risk of aircraft fumes negatively affecting their health. I have made the following recommendation in my submission to the *Draft Master Plan* and to the National Aviation Review, and make it again because the current status quo is unsatisfactory.

Recommendation 5: The Minister commission an environmental and health impact study from the Department of Infrastructure and Transport in conjunction with the EPA, on aircraft fumes and their impact on resident health and the local environment.

4.6 Planning Controls

Future commercial development undertaken at Essendon Airport must be subject to more stringent planning process. This could potentially be done by development proposals being made subject to local council and state government planning regulations.

The issue of planning controls was not within the terms of reference for the Essendon Airport Ministerial Working Group. Nevertheless it is an issue that requires due attention in order to protect and secure the local amenity and liveability of the Strathmore and surrounding communities.

The Department of Infrastructure, Transport & Regional Development's (2008) *Green Paper* states the following;

The Government is keen to work with state and territory governments and industry on improved arrangements for planning and development on airports, subject to some key principles:

- *the Commonwealth Minister will retain final decision-making authority for land use planning and development;*
- *arrangements for assessing plans and development proposals on airports and their supporting consultative procedures should be designed to encourage investor certainty and community confidence; and*
- *cooperative arrangements will be developed with the states and territories to better integrate airport planning and development and regulatory oversight with local and state and territory planning and regulatory arrangements, whilst ensuring reasonable provision for the protection and development of the airports.*

The paper further states;

The Government's preferred position is that the Australian Government Minister be given the power to establish expert Airport Planning Advisory Panels for each of the major airports to assess, at the Minister's request, airport Master Plans and Major Development Plans. The Panels would report to the Minister, who would retain the final decision-making authority.

The Panels would comprise people with planning and/or aviation expertise drawn from government, industry and the community. The Panels would enable expert independent analysis and advice to be provided to the Minister on the implications of airport projects for things such as traffic and public transport, and other areas of local planning. The assessments could include consideration of the outcomes of public consultation and the airport's response.

Community consultation must be strengthened as part of any future aviation policy. The *Draft Master Plan* process, while setting out the general direction of Airport development over a five year period, fails to specify exact locations of where new constructions and developments aim to be undertaken on airport land. As a result of this local residents have felt firsthand the ramifications of not being notified of developments, specifically in the form of the new emergency service air wing facility which is directly of the back fence of local residents.

We acknowledge that EAPL have implemented recommendation 10 from our joint submission to their *Draft Master Plan*, and agreed to set a minimum 20 meter buffer zone between any commercial developments and residential back fences. We encourage EAPL to secure this buffer zone by investing in suitable landscaping that will further minimize noise, fumes and other disturbances.

Recommendation 6: More stringent planning guidelines and consultation processes should be introduced. EAPL should adhere to the advice of the State Government and local Council with regard to any developments on site to ensure plans are consistent with local and state planning regulations.

4.7 Motor vehicle traffic accessing Essendon Airport

Under no circumstances do we support a road link into the Airport from Strathmore. EAPL (2008:84) state the Hart Precinct is partly land locked although mention that it is accessible from Strathmore.

Traffic currently access the Airport land from three separate entrances including from Wirraway Road in the north of the site, Matthews Avenue in the middle and Bulla Road in the South which access the Direct Factory Outlet Shopping Centre.

The residential streets of Lebanon Street, Arvon Road and Mascoma Street in Strathmore are not appropriate streets for increases in traffic and links into any potential developments on this side of the Airport.

4.8 Economic benefit for the community to relocate aircraft from Essendon

As outlined in our previous two submissions, a study commissioned by the Victorian Department of Infrastructure found there are net benefits to the economy as a whole resulting from closing Essendon Airport (Ambidji Group 2000:5).

In 2001 the Howard Government leased Essendon Airport to Linfox and Becton Groups for \$22 million. At the same time the 305 hectare site, 11 kilometres from the Melbourne CBD was valued between \$70 million and \$100 million (Davidson 2008).

Essendon Airport is not profitable as an Airport. It was leased in 2001 with restrictions on the type of aircraft accessing the site and hours of operations. It was not profitable then as an airport and as the current *Draft Master Plan* outlines, it is still not profitable without relaxation of the curfew and plane size (Davidson 2008). Negotiations should be initiated with EAPL on future alternatives and land use options for the site, which would be to the financial benefit of both the private operators and taxpayers.

5. Recommendations

Recommendation 1: The Australian Government's *National Aviation Policy Statement- White Paper* should incorporate the phasing out and relocation of aircraft from Essendon Airport to other more suitable airfields.

Recommendation 2: The Essendon Airport Ministerial Working Group's recommendations regarding minimising noise should be considered as part of the Australian Government's *National Aviation Policy Statement- White Paper*.

Recommendation 3: The Essendon Airport Ministerial Working Group's recommendations due in April, regarding minimising noise and disturbances emanating specifically from helicopter operations, should be considered in the context of the Australian Government's *National Aviation Policy Statement- White Paper*.

Recommendation 4: The existing curfew at Essendon Airport should be enforced, with no exemptions, between the hours of 11pm and 6am.

Recommendation 5: The Minister commission an environmental and health impact study from the Department of Infrastructure and Transport in conjunction with the EPA, on aircraft fumes and their impact on resident health and the local environment.

Recommendation 6: More stringent planning guidelines and consultation processes should be introduced. EAPL should adhere to the advice of the State Government and local Council with regard to any developments on site to ensure plans are consistent with local and state planning regulations.

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