

Submission to the Moorabbin Airport 2009 Master Plan

The Moorabbin Airport Master Plan focuses on six main themes

- 1) Increased aircraft movements at the facility
- 2) Preservation of the site as an airport
- 3) The economics of the site including such matters as training commerce
- 4) Employment associated with the existence of the airport
- 5) Use of the site for commercial development
- 6) Planning freedoms (which are divorced from local planning requirements)

In terms of points 3), 4) and 5), it is reasonable to assume that no matter who controls the site and what it is used for, it would generate employment and commercial opportunities. In fact there is every chance that if proper economic modelling were conducted looking at maximising the return from the site for the Eastern Region of Melbourne, there would be many alternatives offering superior economic return and superior employment benefits.

The unfair planning privileges that MAC has been granted which relate to point 6) are a by-product of previous irresponsible legislation. This needs to be considered in terms of whether the current Minister believes it is morally or ethically appropriate to perpetuate the existing unconscionable planning arrangements by sanctioning the tabled Master Plan. Allowing a privately leased airport to control its own self interested planning when the facility is surrounded by a community and other industries which are publically accountable for their planning, is completely undemocratic. It means that at a whim, MAC (a private organisation) can literally make self interested planning decisions which transfer significant wealth from their community neighbours to the share holders of MAC.

Point 1) and 6) are interrelated in that an increased noise exposure forecast (ANEF) caused by more aircraft movements will force changes to local planning overlays and these will be imposed on the community by Local Government. These overlays will reduce community freedoms and directly impact on the worth of homes and other properties. The overlays will also impact on the discretion residents and businesses have in terms of whether they can continue to use their assets for the purposes for which they were originally acquired - be this other forms of commerce or simply an opportunity to raise a family and enjoy a reasonable quality of life. MAC may argue that it does not direct local community planning but it knows its proposals and actions will nevertheless force a change to the local planning overlays. Flawed Federal legislation has essentially created a situation which is tantamount to an indirect and unjust acquisition of rights over property. What is also concerning is the lack of an independent review of the ANEF methods and results. MAC claims that Air Services Australia signs off the ANEF but Air Services says that it only reviews the methodology not the assumptions and data used in the modelling. MAC also claims that Local Government signs off the ANEF but local government has even less understanding of the ANEF

modelling process than Air Services. Moreover Local Government cannot impact on the ANEF so this part of the exercise is only a courtesy. The ANEF models were designed for airports like Melbourne which are profoundly different in terms of type and movement of aircraft. For example an Air Services chart of aircraft movements over Moorabbin for a month looks like a dense black cloud of random aircraft tracks. The same chart produced for the Melbourne airport shows far more discrete corridors of movement. In the two examples the aircraft are also completely different. It is possible that many of the aircraft using the Moorabbin airport are not even contained in the modern ANEF software. Given the resultant impact which the ANEF contours have on local planning, asset use and asset values there is an urgent need for a full and proper independent audit and publication of the ANEF model data and assumptions.

The only sections of the plan with any relevance to aviation are those which deal with increased aircraft movement and the preservation of the site as an airport ie points 1) and 2). As far as point 1) is concerned, in principle there is no reason why the site cannot be used as a general aviation facility but this has to come with sensible activity limits. Presently the tabled Master Plan is not sustainable from the perspective of human ecology and one has to wonder why government is prepared to moderate commercial freedoms on the basis of animal ecology and yet give so little regard to the human environment surrounding the Moorabbin airport. Sensible activity limits need to recognise that the airport exists within an urban community and that the community is duly entitled to certain rights and expectations with regard to social wellbeing & security, social equity and social justice. All of this needs to be carefully defined in the Master Plan (which is not currently the case) and someone (other than MAC) needs to assume responsibility for proactively overseeing that the social balances are achieved. At the moment the social balance is unattended. MAC has made no secret of its reluctance to be involved with any defined issues relating to the welfare and amenity of the community and MAC has publically announced that increased airport activity will reduce community amenity. It follows that there will be ongoing direct and indirect reductions in quality of life for local residents. At a time when the environment is a preeminent priority in most political debates there seems to be a bizarre lack of regard for the environmental impact of the Moorabbin Airport on the surrounding community.

If there is to be Master Plan which talks about the augmentation and protection of the airport, point 2) then it can only make sense in the context of a corresponding Master Plan which talks about the augmentation and protection of the surrounding community (in the context of the airport and aviation). Furthermore the two plans cannot be authored by MAC which is essentially what is occurring at the moment in the sections of the plan where MAC makes reference to so called community consultation. Almost nothing has been achieved in the best part of a dozen years of community consultation. This is clearly because consultation is an empty notion when there are no specific community responsibilities or expected outcomes. It is disturbing that MAC infers ownership of Fly Friendly initiatives which is patently not the case and even if it were, the existing fly friendly charts are

largely ignored by aircraft in the Moorabbin area. There is even the question of the logic of the existing Fly Friendly charts with one fly friendly area over an obviously rural allotment adjacent to the Eastern perimeter of the Moorabbin control zone. In stark contrast are some of the highest concentrations of aircraft activity in the urban precinct around the Mordialloc Creek Jetty and adjoining coast line which is not a Fly Friendly area. Here an area which is one twentieth of the size of the whole control zone experiences one quarter of the aircraft activity as measured by transponders and Air Services charts. Interestingly both Local Government and Parks Victoria have recognised the importance of this coastal precinct either side of and adjacent to the Mordialloc Creek and implemented land and marine friendly initiatives. But the area continues to be compromised by aircraft activity, much of it low and inappropriate, apparently taking in the scenic coastal vistas on approach or departure from the airport, in transit along the coastline, pulling advertising banners or just joy riding along the beach. Because this sensitive area is within the control zone aircraft can assume virtually any altitude provided they are vaguely approaching or departing from the airport.

The unconstitutional way in which MAC has been allowed to operate is made more precarious by the fact that it does not appear to have an appropriate level of corporate maturity for such freedoms. It has demonstrated lack of basic corporate social responsibility in many of its published comments. One such comment relates to it not having any concern about what happens after planes leave the ground. Another is its insistence that it not be held responsible for aircraft noise emissions. Yet another is its repeated reference to the Federal Government being the reason it can continue to compromise the amenity of the community and why it believes this is enough reason for it to continue doing so.

In short, the residents and businesses in the communities surrounding MAC are not being treated fairly. The model and initiatives which MAC is championing are unjust, undemocratic and unconstitutional. It is also an example of the tragic demise of an important geographical area with a coastal corridor boasting community amenity which rivals any in Australia. There are clear grounds for the lawfulness of this situation to be properly scrutinised. A whole community is paying for lack of foresight in previous administrative decisions and the community should have the right to request that those decisions be independently reviewed. It is likely that the authoring government did not foresee the effects on the community of the freedoms which it granted MAC. Those freedoms have resulted in loss of a democratic process, abuse of power and denial of fundamental community rights. To endorse the tabled Master Plan is to perpetuate the unfairness.