

22 July 2009

Preliminary Draft Master Plan Submissions
Moorabbin Airport Corporation Pty Ltd
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Dear Sir/Madam,

Re: Moorabbin Airport Corporation – *Preliminary Draft Master Plan 2009 and Preliminary Draft Environment Strategy 2009*

I am writing in response to the advertisement on the Moorabbin Airport website (www.moorabbinairport.com.au) seeking public submissions on the above draft documents.

I am a resident of Mordialloc, living near Parkdale Secondary College, and approximately 1 km from the southern edge of Moorabbin Airport. I live in a residential area, and I am affected by the worsening noise and disturbance caused by an increasing large number of aircraft using the airport and flying over the suburb of Mordialloc. I am also worried about the increased risk of aviation accidents due to the dramatic increase in aircraft movements at the airport, and the rapid rise in the numbers of inexperienced student pilots based at Moorabbin Airport over the last few years (at least since 2006/07).

Increase in aircraft movements

“Movements in 2008 were 351,000 which averages out to 6,750 per week although on busy days we can experience well over

2,000 movements” (from www.moorabbinairport.com.au).

The *Preliminary Draft Master Plan* does not provide a clear summary of the annual number of aircraft movements over the past decade – the annual figures which can be drawn from the text are incomplete and inconsistent. The number of annual movements for 2003/04 is reported as 250,000; for 2007 as 310,244 (said to be a “27% increase on 2006 due to a significant increase in commercial flying training, especially of overseas students”, see p. 37); and for 2008 as 350,000. Figures for some years are missing, and it is not clear whether figures are for calendar years or financial years, making any analysis difficult. In addition, the summary of Monthly Aircraft Movements from (Table 1, p. 39) is of limited use in this regard, and disguises the real annual trends.

The *Preliminary Draft Master Plan* provides a ‘long range forecast’ that air traffic will reach 500,000 annual movements by 2031 (p. 38-39), ie, outside the timeframe of the 2009 Master Plan. It is clear that this data based on a 1.5% growth rate calculated in 2007, before the rapid increase in annual movements due to commercial pilot training occurred. A re-forecast needs to be carried out, taking into account the higher growth rates since 2007, which potentially sees the airport reaching the forecast figure much earlier than 2031, and therefore within the timeframe of the *2009 Master Plan*.

The definition of the term ‘aircraft movement’ needs to be clarified. It appears that annual figures “only account for aircraft operating during the operational hours of air traffic control’ (p. 38). If this is true, and considering that the Moorabbin Airport ATC Control Tower only operates from 8am-6pm in winter (and 9am-7pm in summer), then the existing figures only cover 10 hours out of the 24 hours per day that the Airport is in operation, and are severe underestimates of actual aircraft movements.

It is also uncertain whether the definition of ‘aircraft movement’ adequately covers the large amount of circuit training carried out by student pilots every day. What might be classed as ‘one movement’ (ie, one aircraft taking off) may actually be many ‘circuits and bumps’ during a training flight around the airport vicinity, and which appears as many more aircraft movements to neighborhood residents.

The vague aircraft movement figures highlight a lack of reliable traffic data, and the need for real figures to provide accurate forecasts about annual movements over the next 20 years, and provide a better estimate of when Moorabbin Airport will reach

ultimate capacity (a figure which seems to be wavering around 500,000 to 600,000 in the *Preliminary Draft Master Plan*). At present, it appears that the public is being misled about the drastic increase in actual aircraft movements over the last five years in particular, and expected rises over the next few years.

As stated in the Preliminary Draft Master Plan, the main increase in aircraft movements over the past 3-4 years is “mainly due to an increase in flying training” (p. 38). The *Preliminary Draft Master Plan* does not appear to place any limits on the number of flight training schools which can operate at the airport (currently training is provided by 11 flying schools), or the number of students which they enroll (currently 800 FTE students per year, see p. 38), so there are effectively no controls in place for commercial flying training.

In order to bring the number of aircraft movements back to what would be considered to be sensible levels (ie, under 250,000), I would support the transfer of all training flights from Moorabbin Airport, and out of the Melbourne metropolitan area as has been proposed by other parties.

Increased risk of aircraft incidents and accidents

“The flying school has continued to be extremely busy and everyone is feeling the strain. The maintenance team have been under enormous pressure to keep our fleet in the air. We have experienced a number of incidents over the past few months and I have to say that many of these were avoidable. At a recent Instructor meeting instructors were asked to monitor aircraft handling and caution anyone seen behaving unprofessionally. The areas of concentration will be taxiing speeds, aircraft proximity to buildings and ground handling. On a number of occasions aircraft have been damaged and that damage has gone unreported. As a result of this aircraft are being inspected each day and any damage is investigated to determine who could have been responsible” (Stuart Rushton, Royal Victorian Aero Club President, writing in *Plane Talk*, magazine of the RVAC, Winter 2008, p. 4; see: http://www.rvac.com.au/files/news_file_119.pdf).

“Flying activity is increasing due mainly to worldwide demand for pilots; the boom is putting a severe strain on aviation resources. The

ATC personnel in Moorabbin Tower are absolutely flat out handling the busy periods at weekends. We can all help to reduce the pressure for them by making short and precise radio transmissions, only reading back the required items” (Stuart Rushton, Royal Victorian Aero Club President, writing in Plane Talk, magazine of the RVAC, Autumn 2008, p. 2; see: http://www.rvac.com.au/files/news_file_105.pdf).

“You have no doubt noticed the boom in activity we are enjoying at Moorabbin. We haven't seen these traffic levels since the early nineties. Back in those days we had four staff in the tower but most days now we only have three, so we are experiencing a greatly increased ATC workload. Frequency congestion can be a big problem. Consequently we may have to limit certain activities to ensure the safety of the service we provide” (Warren Sparrow, Moorabbin Tower Manager, writing in Plane Talk, magazine of the Royal Victorian Aero Club, June 2007, p. 13; see: http://www.rvac.com.au/files/news_file_86.pdf).

It is logical to say that with more aircraft movements and more flights, there will be more congestion on the ground and in the air, aircraft will be in closer proximity to each other, and there is greater risk of incidents and accidents. Coupled with aircraft maintenance staff and air traffic controllers struggling to keep up with workloads because of the increase in aircraft movements (as evidenced in the alarming quotes above), the risk of accidents is even greater.

The *Preliminary Draft Master Plan* fails to provide an adequate analysis of the risk factors affecting the operation of Moorabbin Airport and the safety of neighboring residents. It is not a straightforward exercise to find detailed information about accidents and incidents which have occurred at the Airport. I am aware of the 3-4 fatal or very serious accidents involving aircraft over the last 10 years, such as the mid-air collision between two planes on training exercises near the Airport, killing the student pilot of one plane and forcing the other to make an emergency landing, on 27 August 2008; and two planes conducting training which collided and burst into flames on the runway, killing one pilot, on 29 July 2002. These accidents received extensive media coverage.

However it is more difficult to find records of other incidents which have involved

pilots and aircraft based at Moorabbin Airport. I have found some of these accidents and incidents reported in the media in recent years (see **Attachment 1**). These reports provide a graphic view of aircraft accidents and crashes at Moorabbin in recent years.

Otherwise it has been necessary to carry out a thorough search through the Australian Transport Safety Bureau (ATSB) – Weekly Summaries of aircraft accidents and incidents to uncover other information (see: <http://www.atsb.gov.au/aviation/weekly-summary.aspx>). I have provided my own summary list of the incidents involving the Airport, for the six month period between January-June 2009 (see **Attachment 2**). The list shows an alarming number of incidents (44 in total) which were reported to the ATSB. The majority relate to runway incursions, where the main issues are failing to remain behind the line at the holding points until cleared to enter a runway, and crossing active runways without clearance. Many of these incidents no doubt involve student pilots in training. Other frequent occurrences relate to the failure of pilots to comply with ATC instructions, controlled airspace violations, aircraft mechanical issues and failures, and bird-strikes. I expect a more thorough search of the ATSB database would show the same pattern of reported incidents at Moorabbin Airport over the last 3-4 years (ie, since the boom in student pilot training in 2007).

Once again, I suspect that these incident reports to the ATSB are only made when the Moorabbin Airport ATC Control Tower is in operation during the day, and that there are incident reporting failures when the Tower is non-operational at night, so the actual number of incidents at Moorabbin is probably higher. Indeed, a 1999 report conducted by the Bureau of Air Safety Investigation (now part of the ATSB) found that safety rules were being flouted at Moorabbin Airport after the control tower closed at night (see: www.highbeam.com/doc/1P1-55024139.html).

The potential for problems to occur is now much worse because of the high number of student pilots involved in circuit training at night. On an evening in early July this year, I observed five aircraft involved in circuit training to the east of the Airport over the suburb of Dingley. This activity was taking place after the ATC Control Tower had closed at 6pm, and before circuit training was required to stop at 9pm (winter hours). By my count, there was an interval of no more than 30-45 seconds between aircraft in the circuit, which obviously does not leave a large margin for error.

The *Preliminary Draft Master Plan* does not refer to any plans to recommend changes to the operating hours of the Moorabbin Tower. Essentially it will continue to remain in operation for only 10 hours each day, and during daylight hours. To decrease the

risk of aircraft incidents and accidents, I would argue that night-time operations of planes at Moorabbin Airport (particularly student pilot training and circuit training), when the Moorabbin Tower is not in operation, should cease.

There are at least two other aircraft activities at Moorabbin Airport which should stop immediately because of the unacceptable risks involved.

Although the *Preliminary Draft Master Plan* reports that an aerobatic area has been established near Cranbourne for aerobatic manoeuvres, this highly risky activity still takes place at Moorabbin. On Sunday 14 September 2008, I witnessed a plane performing aerobatics high over the airport for at least 15-20 minutes. According to reports, this was aerobatic pilot Pip Borrmann performing in his Edge 540 plane (VH-PIP) at an air display at the Royal Victorian Aero Club's 'Dawn Patrol' event.





(Images of Borrman's stunt flying at Moorabbin on 14 September 2008, taken from the RVAC Plane Talk magazine, Summer 2008 edition, at:

http://www.rvac.com.au/files/news_file_137.pdf)

Unfortunately, five months later, Borrman was killed when his amateur-built aircraft lost power and crashed 'in a ball of flames' beside Shepparton Airport, where he had been practising aerobatics, on 25 February 2009. While Borrman's death is regrettable, it clearly demonstrates the danger of allowing aerobatics at an airfield such as Moorabbin which neighbors residential areas. Any aerobatic flights at Moorabbin must be banned.

Another high-risk activity, formation flying, continues to take place regularly at Moorabbin Airport. I last witnessed this activity involving three planes flying in close formation on Sunday 19 July 2009 at 9.30am. The main groups involved in this style of flying at Moorabbin Airport appear to be the Royal Victorian Aero Club's 'Eagles' and 'Falcons' formation flying teams.



(My photograph of RVAC aircraft VH-BZE, VH-LBL and VH-JIO in close formation

flying over Moorabbin Airport and Mordialloc on Sunday 8 March 2009, 8.00-9.00am).



(Image of the RVAC 'Eagles' in close formation, taken from the RVAC Plane Talk magazine, May 2007 edition, at: http://www.rvac.com.au/files/news_file_84.pdf).

The risks of continuing to allow formation flying at Moorabbin Airport, with the potentially catastrophic consequences with aircraft flying out of formation, and losing separation between aircraft, are obvious. Any formation flying at Moorabbin must be banned.

The *Preliminary Draft Master Plan* needs to outline the strategies by which airport managers will improve the transparency of information and publication of data on all incidents which have the potential to compromise aircraft, airport or community safety.

Increase in noise and disturbance caused by aircraft

Section 7.3 of the *Preliminary Draft Master Plan* (p. 50) deals with 'Aircraft noise mitigation', but it is made clear that Moorabbin Airport Corporation does not control aircraft once they are in the air, and that the *Master Plan* will not directly address issues concerning aircraft noise. The only concession to community concerns about the excessive noise from aircraft operating from the airport is the provision of voluntary 'Fly Friendly' guidelines for pilots. Any public complaints about noise from flying aircraft are directed to Airservices Australia's Noise Information Line (1800 802 584).

The noise from one aircraft taking off overhead can be loud and highly intrusive, but the disturbance is compounded when they are several aircraft in the air at the same time. I now find it common on weekends to have my backyard conversations

drowned out by two aircraft taking off simultaneously on parallel runways and heading to the south of the Airport towards Mordialloc, as well as helicopter training taking place at low altitude south-west of the Airport over Parkdale.

Phone calls or emails to the Aircraft Noise Complaints service to raise concerns over specific aircraft noise incidents are largely ineffectual, because while the call is logged, the main function of the complaints line is only to compile noise complaints statistics.

Since aircraft operating within and around Moorabbin Airport are the main source of environmental noise and disturbance for neighboring residents, the Moorabbin Airport Corporation should not abrogate its community responsibilities so lightly. The Corporation should take a much more socially responsible and active role in the management of aircraft noise for the community. A more pro-active approach from the Corporation becomes especially important considering the expected increase in aircraft movements from Moorabbin Airport, and associated increase in aircraft noise and disturbance to the community. The Corporation needs to provide information on expected noise levels, and how it will actively work to manage and minimize noise pollution, and properly deal with community concerns.

A useful first step, which would help demonstrate good faith to the community, would be for the Moorabbin Airport Corporation to lead in the development and enforcement of a set of compulsory 'Fly Friendly' procedures. Priority issues to address are repetitive circuit flying by student pilots, low altitude flying, helicopter training outside the Airport perimeter, and minimizing any disturbances to airport neighbors in the evenings, at nighttime and at weekends.

As a final point on this topic, I would actively oppose the proposal in the *Preliminary Draft Master Plan* to develop any jet operations at Moorabbin Airport for Regular Public Transport (RPT), an extension of runway 13L/31R, or the construction of a new central runway 13C/31C to try to achieve a greater runway length. I consider all of these proposals to be inappropriate developments for an airport located in a suburban neighborhood.

Conclusion

In summary, while I am not directly opposed to sustainable operations and sensible developments at Moorabbin Airport (some of which are espoused in the *Preliminary*

Draft Master Plan), I am opposed to unregulated and inappropriate developments at the Airport, which will damage the amenity of the neighborhood and threaten the safety and security of residents. I am particularly opposed to any increases in aircraft movements, any risk to the community from aircraft accidents and incidents, and the noise and disturbance directly caused by aircraft using Moorabbin Airport.

If you require any clarification about my submission, please contact me.

Yours faithfully,

Timothy Stranks

Encl.

Attachment 1: Selected images of incidents and accidents at Moorabbin airport.

Attachment 2: List of accidents and incidents at Moorabbin Airport between January-June 2009, taken from the ATSB Aviation Safety Database.

