



***Town and Country Planning Association
Incorporated***

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Registration no. A0031095J

<http://www.tcpa.org.au/>

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Mr Lyall Strambi
Chief Executive Officer
Australia Pacific Airports (Melbourne) Pty Ltd – APAM
Melbourne Airport VIC 3045
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Dear Mr Stambi

***Preliminary Draft Melbourne Airport Master Plan 2022 and
Preliminary Draft Melbourne Airport's Third Runway Major Development Plan 2022
Submission by the Town and Country Planning Association Inc.***

The Town and Country Planning Association (TCPA) advocates integrated planning of land use and transport for ecological sustainability and a healthy living environment. The TCPA is a non-profit public organisation established in Victoria in 1914 and is independent of any party political organisation.

Please find on the following pages the TCPA's submission in response to *Preliminary Draft Melbourne Airport Master Plan 2022* and *Preliminary Draft Melbourne Airport's Third Runway Major Development Plan 2022*.

Yours sincerely

Peter Hill
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About the TCPA

Established in Victoria in 1914, the Town and Country Planning Association Inc. (TCPA) is a politically independent, not-for-profit association incorporated in 1994 and is independent of any party political organisation. Its members and supporters represent a wide cross-section of land use and transport planning expertise and interests.

The TCPA is fortunate in that its membership includes two retirees who, between them both, have around 76 years of experience in airport planning and policy, particularly centred on planning and development of Melbourne Airport and other Victorian airports.

To learn more about the TCPA visit: <https://tcpa.org.au/about-us/>

Considerations in preparing this submission

In addition to the *Preliminary Draft Melbourne Airport Master Plan 2022* (Draft Master Plan 2022) and the *Preliminary Draft Melbourne Airport’s Third Runway Major Development Plan 2022* (Draft M3R MDP 2022), the TCPA has also considered the following documents:

- *Melbourne Airport Strategy* (Government of Victoria/Federal Airports Corporation, approved 1990) and its associated *Final Environmental Impact Statement* (EIS) prepared under the Commonwealth *Environment Protection (Impact of Proposals) Act 1974* and subsequently approved by the Minister for the Arts, Sport, the Environment, Tourism and Territories on 12 November 1990;
- Council of Australian Governments, *Heads of agreement on Commonwealth and State roles and responsibilities for the Environment* (1997);
- Maclellan, R, and Aoshima, Y, (1999, 16 – 19 March), *COMMISSION 1: Airports and their Surrounding Zones as Catalysts of Metropolitan Development – Final Report*, 6th Metropolis International Congress, Barcelona, Spain.
- *This Melbourne-based project ran between 1997 – 1999 and was chaired by the Hon. Robert Maclellan, then Minister for Planning and Local Government, with Yukio Aoshima, then Governor of Tokyo, as Vice-Chair. Melbourne Airport was represented on the working group in Melbourne.*
- *National Airports Safeguarding Framework* (NASF) (as agreed by Commonwealth, State and Territory Ministers at the meeting of the Standing Council on Transport and Infrastructure on 18 May 2012 and any subsequently agreed changes), in particular, its associated *Guideline A – Measures for Managing Impacts of Aircraft Noise*;
- Victorian Government, *Victoria’s Regional Statement: Your Voice, Your Region, Your State*, 2015
- The current *Brisbane Airport Flight Path Changes Post Implementation Review*;
- Victorian Transport Action Group (VTAG), *Adverse Effects of Melbourne Airport’s Runway Development on Community Health*, (28 March 2022); and
- VTAG Submission to the Draft Master Plan 2022 and the Draft M3R MDP 2022 submitted on 6 May 2022.

The Victorian Transport Action Group (VTAG) and the TCPA share some members and we were able to share and debate ideas as part of preparing our own submissions. In preparing this submission the TCPA has liaised with other interested groups and will note support for the propositions of others as and where appropriate.



Key messages of this submission

The TCPA acknowledges

- Melbourne Airport is a key economic gateway serving all of Victoria
- Benefits of Melbourne Airport’s 24 hr curfew free operation
- The strategic context for future development of Melbourne Airport was provided by the 1990 *Melbourne Airport Strategy* (MAS) and its associated *Final Environmental Impact Statement* (EIS).
- Melbourne Airport’s development has occurred in parallel with strategic planning for metropolitan Melbourne, its peri-urban areas, Victoria’s regional cities and their hinterlands. This was a strategic advantage globally acknowledged at the 6th Metropolis International Congress in 1999.
- The Draft Master Plan 2022 and Draft M3R MDP both adopt a conservative approach in forecasts for the post-COVID world. Given that the two existing runways were operating at their maximum practical capacity in 2019, basing passenger, freight and aircraft movement forecasts on a quick trajectory for a return to pre-COVID levels ensures that the airport is as ready as it can be to deliver projects when needed or to delay timing of some if demand is weaker.

This submission does not propose to address all detail of the Draft Master Plan 2022 and Draft M3R MDP 2022, but rather focus on any emerging issues and those areas that reflect the TCPA’s areas of interest, namely:

- Planning for Melbourne Airport, including the *Melbourne Airport Strategy* (MAS)
- Airports Act processes
- Regionalisation
- Third Runway
- Integration of land use and transport planning

Emerging issues

VTAG Submission dated 6 May 2022

The VTAG submission mainly focuses on the detail contained in the Draft Master Plan 2022, particularly in regard to aircraft noise and related health impacts, but also refers to related implications for the Draft M3R MDP 2022.

Its specific recommendations address:

- Aircraft noise and community health;
- Differences between the extent of ANEF noise contours since 1990 and 2022, increasingly affecting residential zones;
- Lessons from the current Brisbane Airport flight path review; and
- Airport Master Planning processes of the *Airports Act 1996*.

<p>1. The TCPA notes and, subject to any comments in this submission, is generally supportive of the recommendations in the VTAG submission.</p>



Brisbane Review

The TCPA notes that the *Brisbane Airport Flight Path Changes Post Implementation Review* is currently being undertaken by Airservices Australia after the first 12 months of operation of Brisbane airport’s new runway. The review process has generated considerable media interest with issues raised including increased aircraft noise due to flight path changes. This follows on from a review by the Aircraft Noise Ombudsman (ANO) into increased noise complaints linked to the new runway in December 2020. The Draft Master Plan 2022 briefly mentions the responsibilities of the ANO when discussing noise monitoring (Section 15.7.7, p306), but there is no discussion of findings and lessons learnt at Brisbane Airport from either the Airservices Australia review or the ANO.

The TCPA is a member of the Metropolitan Transport Forum (MTF) and attended its (virtual) meeting on 6 April 2022 to hear a presentation from Melbourne Airport, *Melbourne Airport: Master Development Plan consultation and 3rd Runway Project*. The presentation was well-received, but in response to questions regarding Brisbane Airport, the MTF was advised that “Melbourne Airport is monitoring the process in Brisbane”. There was no indication as to whether either the Draft Master Plan 2022 or the Draft M3R MDP 2022 would be amended to include discussion and lessons learnt from Brisbane.

2. The TCPA recommends that both the Draft Master Plan 2022 and the Draft M3R MDP 2022 be amended to include discussion and lessons learnt from Brisbane.

2026 Commonwealth Games

Since the Draft Master Plan 2022 and the Draft M3R MDP 2022 were exhibited, it has been announced that the State of Victoria will be host for the 2026 Commonwealth Games, with a strong focus on regional Victoria. In a Commonwealth Games first, Victoria 2026 will introduce a new multi-city model bringing global sport to four regional hubs: Geelong, Bendigo, Ballarat and Gippsland. Each hub will have its own athlete village, and together they will deliver a 16-sport program in world-class regional sporting venues.

This event will clearly have impacts for Melbourne Airport and the Draft Master Plan 2022 should include a new section dealing with the Commonwealth Games, perhaps in Chapter 6. There may be implications for the Draft M3R MDP 2022 as well as other short term projects identified in the Draft Master Plan 2022.

3. The TCPA recommends that the Draft Master Plan 2022 and the Draft M3R MDP 2022 be amended to include discussion relating to the 2026 Commonwealth Games.

Melbourne Airport Environs Safeguarding Standing Advisory Committee

Since the exhibition of the Draft Master Plan 2022, the Victorian Government has released:

- The final report of the Melbourne Airport Environs Safeguarding Standing Advisory Committee (SAC) submitted to the Minister for planning on 15 November 2021; and
- *Safeguarding Victoria’s Airports* – the Government’s response to the SAC report (April 2022).

The Draft Master Plan 2022 addresses the Melbourne Airport Environs Strategy Plan (section 6.3.6, p105). This section should be updated in response the SAC report and the Victorian Government response

4. The TCPA recommends that the Draft Master Plan 2022 be amended to update the matters raised in the final report of the Melbourne Airport Environs Safeguarding SAC and the Victorian Government’s response, Safeguarding Victoria’s Airports.



Planning for Melbourne Airport

The Victorian Government has taken significant steps to safeguard airports and ensure that planning for and around airports considers the potential safety and amenity impacts on surrounding communities, integration with Victoria’s land based transport network and protection of airport operations.

Melbourne's airports (including Melbourne, Avalon, Essendon and Moorabbin) and Victoria's RAAF Bases (Point Cook and East Sale) are important infrastructure assets, vital to the city's social connectivity and economic prosperity.

Victoria's many regional airports (including Ballarat, Bendigo, Hamilton, Latrobe Valley, Mildura, Mt Hotham and Portland) also make significant social and economic contributions to their regions and the State.

Melbourne Airport Strategy (MAS)

Since 1990, the Airport’s vision and development has been strongly underpinned by State and Commonwealth Government approval of the *Melbourne Airport Strategy* (MAS) and its associated EIS in 1990. This document has provided the framework for Melbourne Airport’s master plans and for the Victorian Government’s policy and actions to protect the airport – its development and its environs. It has also been the benchmark for expectations in the broader Victorian community when subsequent master plans for Melbourne Airport were prepared and exhibited.

The joint federal/state approach in developing the MAS and its associated Environmental Impact Statement (EIS) drafts, review and approval processes for the Final EIS has been unique in Australia.

The result has been a hierarchy of documents where airport master plans since 1998 have reflected the strategic intent of the MAS and been supported in the Victorian planning policy and planning schemes as well as being the airport’s tools to facilitate timely development of the airport itself. Similarly, the airport major development plans have provided the statutory approvals for investment in infrastructure (both airside and landside) across the airport site as identified in the master plans.

As noted in our introduction the MAS and Final EIS were prepared under the Commonwealth *Environment Protection (Impact of Proposals) Act 1974* and approved by the then Minister for the Arts, Sport, the Environment, Tourism and Territories on 12 November 1990. Many of its key findings and approval conditions have been retained and enhanced in subsequent airport master plans, including protection of areas and items of environmental and heritage significance; protection of transport access routes; and landside developments that complement Melbourne’s strategic land use plans.

<p>5. The TCPA commends Melbourne Airport in its efforts to maintain the key features of the MAS in the Draft Master Plan 2022 and the Draft M3R MDP 2022.</p>

While the 1974 act was replaced by the more project oriented *Environment Protection and Biodiversity Conservation Act 1999*, the Minister’s approval covered a broad range of issues and placed obligations on state and local governments which are still relevant today for the Victorian Government and Hume and Brimbank city councils.

The history of the MAS was clearly expressed in the Master Plan (Section 4.1.1, p63). However, the TCPA was surprised and understandably disappointed that the Major Development Plan asserts that the master plan “supersedes” the MAS. (Section A3.3.2, p76).

“...However, the MAS is no longer the relevant planning document for the airport, being superseded by subsequent Master Plans prepared under the Airports Act.”



The Airports Act allows that a master plan can supersede an earlier master plan approved under the Act, but it does not provide for a master plan to supersede a document prepared under another piece of Commonwealth legislation or indeed the conditions attached to any related approval.

- 6. The TCPA recommends that the above statement in Section A3.3.2 of the Major Development Plan be deleted and replaced with:**
“While the MAS remains an overarching long term strategic concept, subsequent Master Plans prepared under the Airports Act have been able to refine the detail to give greater certainty to infrastructure investments, including the Third Runway.”

Other Airports

The Draft Master Plan 2022 addresses the role of other metropolitan airports (Essendon Fields, Moorabbin and a proposed future airport to the south-east of Melbourne) and Avalon Airport when considering the Third Runway options assessment (Section 9.2.1.3). This seems an odd spot to be discussing the context of other airports in relationship to Melbourne Airport.

However, there is no mention of the roles of regional airports, particularly Mildura, Albury, Bendigo, Latrobe Valley and even Mt Hotham. Most of these airports have master plans and have ongoing airport infrastructure investment programs.

In 1993 the Victorian Government and the then operators of Avalon Airport, AeroSpace Technologies of Australia Limited (ASTA), released the *Avalon Airport Strategy*, which like the MAS defines a long-term strategic context for Avalon Airport.

The TCPA submits that there is a need to address the roles of each of those airports in supporting Melbourne Airport. Such a discussion would be better placed in Chapter 4 of the Draft Master Plan 2022, perhaps under a new heading such as “Other Victorian Airports”.

- 7. The TCPA recommends that the roles of other Victorian airports in supporting that of Melbourne Airport be included in a new section in Chapter 4.**

Safeguarding Melbourne Airport

Aircraft noise impacts

Some TCPA members are also members of the Victorian Transport Action Group (VTAG) and have drawn our attention to a recent paper, *Adverse Effects of Melbourne Airport’s Runway Development on Community Health*, (28 March 2022). The paper outlines the 2018 findings of various studies undertaken by the World Health Organisation (WHO) identifying personal health impacts beyond sleep disturbance and general distraction used in the current Australian Noise Exposure Forecast (ANEF) System for modelling future aircraft noise impacts.

The newly identified impacts include noise distress and delay in cognitive development and the WHO has proposed critical noise levels (dB) that are lower than currently used to address transport related noise. VTAG notes that these are currently not addressed in the *National Airports Safeguarding Framework* (NASF) or its *Guideline A – Measures for Managing Impacts of Aircraft Noise* and recommends that they should now be addressed.

Health impacts of transport operations were not subject of detailed spatial research even 25 years ago. It has taken the research of academics like Distinguished Professor Billie Giles-Corti (RMIT University) working with geography researchers to start to apply a spatial dimension to chronic diseases and their causal links with transport related air and noise emissions.

In recognition of her work, in 2020 the TCPA awarded its Sir James Barrett Memorial Award medal to Distinguished Professor Giles-Corti.

<https://tcpa.org.au/sir-james-barrett-memorial-award-for-2020-presented-to-distinguished-professor-billie-giles-corti/>



8. The TCPA supports the VTAG recommendation to review NASF Guideline A to include personal impacts identified by the WHO and recommends that Melbourne Airport also advocate for such a review.

Changes in ANEF contours between 1990 and 2022

The VTAG paper also addresses the significant changes that have occurred in Melbourne Airport’s ANEFs since the approval of the MAS in 1990. It notes that in 1990 the ANEF noise contours largely avoided residentially zoned land, but that more recently there have been significant intrusions into residentially zoned land. It is likely that the creep has occurred gradually in previous master plans prior to 2018.

The Draft Master Plan 2022 (Figure 15-32, p295) shows a general contraction of the new ANEF contours in all directions when compared to the 2018 ANEF (except for a relatively small increase to the south and a section to the north within the green wedge). While any improvement from 2018 is good, the overall contour creep since 1990 is still a problem which has not been addressed in the Draft Master Plan 2022. The Draft Master Plan 2022 should be amended to include the historical evolution of Melbourne Airport’s ANEFs, much like the historical description of the airport development concepts in *4.3 Previous Master Plans* (Fig 4.2, pp64 and 65)

9. The TCPA supports VTAG’s concern that ANEFs produced since 1990 have resulted in significant “Contour Creep” beyond that approved in the MAS into both the 2018 and 2022 ANEFs and recommends that the Draft Master Plan 2022 be amended to include a historical description of the ANEFs associated with each previous master plan

Airports Act processes

Except for Avalon Airport, federally leased airports in Victoria are subject to the *Airports Act 1996* and its associated approval processes. Avalon Airport and all other Victorian airports are subject to state environment and planning legislation and processes. Likewise, the proposed airport to Melbourne’s south east as proposed in *Plan Melbourne 2017-2050* will also be subject to state processes, including independent review.

The Airports Act does not allow for a mandatory independent review process for airport developments, despite the success of the approach for the MAS. This is a somewhat unique arrangement when compared to planning for other major transport infrastructure investments of state and national significance. Each of the following transport projects in Victoria has been subject to planning and environmental assessment independent review processes:

- Western Highway Duplication (various sections)
- North East Link
- Suburban Rail Loop Stage 1
- Port of Melbourne – Webb Dock EES
- Port of Melbourne – Channel Deepening Project (twice)
- Westgate Tunnel Project
- Melbourne Airport Rail Link (twice so far)

Roles of Airports under the Airports Act

In none of the above cases was the project proponent expected to perform the role of independent reviewer that federally leased airports appear to play under the Airports Act 1996.

The state and territory governments of Australia are legitimate and key stakeholders in protecting the amenity and health of their communities in hand with supporting future airport growth. State and territory governments were and remain key participants in the development of the agreed NASF and its incorporation in their planning systems, including in Victoria’s case, the *Victoria Planning Provisions (VPP)*.



Like the Victorian projects listed above, significant airport development projects, such as the additional runways at Brisbane and Melbourne Airports, deserve a similar collaborative approach to preparation and assessment of these strategic plans and projects and the benefits of an independent review.

The TCPA believes that the Melbourne Airport Third Runway is of such significance and there are lessons to be learnt from Brisbane Airport the Draft M3R MDP 2022 to warrant to a joint federal-state independent review along the lines of that used in the 1990 MAS.

10. The TCPA recommends that Melbourne Airport advocate with the Australian Government to work with the Victorian Government to jointly convene an independent review of the Draft M3R MDP 2022.

Regionalisation

While Melbourne Airport is located within the Melbourne metropolitan area, its influence carries and is felt far wider. The Master Plan needs to recognise this and reflect on the airport’s role and influence in regional areas – in terms of connections to and economies of Victoria’s 10 key regional cities and rural areas. The current draft barely mentions regional Victoria!

The TCPA partnered with the Rail Futures Institute Inc. and, in January 2022, released a discussion paper, *Rail as a Catalyst for Regional Growth*. The discussion paper considered the need to boost population growth and support social and economic development in Victoria’s regions:

- Potential population scenarios which might rebalance the relative sizes of regional and metropolitan populations, noting that even prior to COVID there was a trend to regional living and remote working which the pandemic has accelerated; and
- The roles of rail transport (including emerging faster rail systems) and other transport modes (including air).

The discussion paper and a summary are available at the TCPA website – <https://tcpa.org.au/rail-as-a-catalyst-for-regional-growth/>

We believe that, if the airport plan is to be a truly strategic document, it should include some discussion that considers Melbourne Airport and aviation’s roles in supporting regional Victoria.

- *Victoria’s Regional Statement: Your Voice, Your Region, Your State*, and its 10 key regional cities, regional markets, regional airports and regional growth plans need to be acknowledged
- Include regional transport network connections to Melbourne Airport in the Ground Transport Plan as well as metropolitan connections.
- An additional objective/s either specifically focused on both metropolitan Melbourne and regional Victoria. The current draft is wording is too vague and in the absence of a regional analysis could be considered dismissive!

These aspects were covered in previous master plans, but appear to have “dropped off the radar” in the 2022 draft.

11. The TCPA recommends that the Draft Master Plan 2022 be amended to demonstrate a deeper understanding of the relationship between Melbourne Airport and regional Victoria

Third Runway

Planning for the Third Runway has seen a switch from an east-west to north-south orientation. This is logical – one only has to consider the predominant northerly and southerly wind patterns for Melbourne http://www.bom.gov.au/climate/averages/wind/selection_map.shtml.



What is less clear in both the Draft Master Plan 2022 and Draft M3R MDP 2022 is whether any consideration was given to constructing both the 3rd and 4th runways at this time— especially given:

- Extent of earthworks required to construct 3rd runway will include areas identified for the 4th runway.
- The opportunity to spread the noise impacts sooner rather than later; and
- The increased cost may be a driver, but it could be cheaper overall to act sooner rather than comeback later causing further disruption.

It would be useful to address this in the Draft Master Plan 2022, even if that option ends up not being favoured.

12. The TCPA recommends that the option of constructing both the 3rd and 4th runways now be included in the Draft Master Plan 2022.

Integration of land use and transport planning

Transport Integration Act 2010

Alignment between land use and transport planning is critical to providing efficient, safe and sustainable movement for people and goods, and achieving land use planning goals such as accommodating the future growth in population and employment in Victoria.

Integrating land use planning and transport planning requires land use planning decisions to consider the current and future development and operation in the transport system.

Transport planning is complex, and many parties are involved in development and delivery of transport infrastructure. While Melbourne Airport is not specifically nominated as a transport body in the Victorian *Transport Integration Act 2010* (TIA) public authorities and transport providers are, including the Port of Melbourne and the Port of Hastings. Some regional airports (council-owned) are caught by the TIA.

Master plans for Moorabbin, Essendon Fields and Avalon airports address the TIA, in particular, its vision statement, transport system objectives, principles and statements of policy principles. For completeness, the Draft Master Plan 2022 should consider how Melbourne Airport would act if it were subject to the TIA.

13. The TCPA recommends that the Draft Master Plan 2022 be amended to include discussion of how Melbourne Airport would act if it were subject to the TIA.

Ground Transport Plan

The TCPA is generally supportive of the Ground Transport Plan outlined in the Draft Airport Master Plan 2022 and notes the efforts to connect the airport’s bicycle paths to Melbourne’s strategic cycling corridors and to improving end-of-trip facilities.

The TCPA would have liked to have seen more attention given to the development of safe pedestrian networks (ideally separated from bicycle paths and catering for all ages and abilities) for walking between:

- Landside precincts; and
- Passenger terminals

14. The TCPA recommends that the Draft Master Plan 2022 be amended to include discussion of dedicated pedestrian network.

END