



**Submission to the Proposed Amendments  
to the Air Navigation (Essendon Airport)  
Regulations 2001**

**October 2017**

## **1. Introduction**

This submission is made by Moonee Valley City Council (Council), being the responsible authority for the administration and enforcement of the Moonee Valley Planning Scheme, for the land surrounding the Airport.

Essendon Fields Airport has a long established presence in the City of Moonee Valley, and makes an important contribution to the local and broader regional economy. The airport is located adjacent established residential areas, with commercial and industrial uses to the west. In order to manage the impacts of aircraft operations the airport has established flight curfew arrangements.

The current arrangements do not prevent all movements during the curfew hours. In addition to emergency services, some helicopter freight and business movements are also permitted. As such, the Current curfew doesn't protect residents – as demonstrated by the fact certain aircraft and helicopters are unrestricted in the number of air movements and landing that could occur.

Essendon Fields Airport is proposing to adapt the current arrangements to better reflect the needs of the aviation industry, whilst resulting in improved amenity conditions by removing some flight movements that impact upon residential areas such as non-emergency helicopters.

Council has reviewed the Public Consultation Paper provided by the Department of Infrastructure and Regional Development, and makes the following comments.

## **2. Background – Council's established position**

In Council's submission to the Essendon Airport Draft Master Plan (2013), the importance of consultation with Council in regard to the types and times of flights at the airport was highlighted.

Council continues to maintain its position as provided in that submission, being that residents should not be adversely affected, either in terms of amenity, or in terms of development, on account of the continued operation of the airport, or by the introduction of new airside service operations.

Essendon airport is not afforded a buffer or separation areas between airport operations and sensitive uses. Residents living nearby have the potential be exposed to negative amenity impacts from airport operations. Given this context, Council's established view has been that the Airport must engage extensively with the community in relation to its current and future operations, and outline the rationale for the proposed changes.

Council also notes its continuing support for the ongoing operation of the Community Aviation Consultation Group (CACG) and the Fly Neighbourly Agreement.

### **3. Proposed Amendments**

#### **1. Lifting the permitted weight limit for jet aircraft from 45,000kgs to 55,000kgs for operators during non-curfew hours**

The information provided in the Public Consultation Paper in relation to this amendment could be enhanced to assist the public in understanding the proposed changes.

The Public Consultation Paper (p. 3) states: *“Advances in aircraft engine and airframe technology have allowed larger jets to operate at noise profiles at or below older, smaller jets”*. However the examples provided in the paper suggests this is not always the case.

The ‘flyover’ decibels of a ‘Bombardier Global Express’ (in the 45,000kgs – 50,000kgs weight range) is given as 83.5, which is above that of the ‘Hawker Beechcraft 1000A’ and ‘Dassault Falcon 20’ (Jets with weight less than 45,000kgs) are noted as having ‘flyover’ decibel levels of 81.8 and 82.9 respectively.

Similarly, the Fokker F28-100 (in the 45,000kgs – 50,000kgs weight range) and the Boeing 717-200 (in the 50,000kgs – 55,000kgs weight range) both have ‘flyover’ and ‘landing’ decibel levels above that of the ‘Hawker Beechcraft 1000A’ and ‘Dassault Falcon 20’ (Jets with weight less than 45,000kgs).

These figures suggest the ability of these larger aircraft to operate during the non-curfew hours will not necessarily result in improved noise outcomes as the discussion paper suggests (p. 4).

Further information, such as a detailed aircraft noise assessment would allow the community and relevant stakeholders such as Council to better understand the proposed amendments, the positive and negative impacts on the community, and enable a more suitably informed assessment of the proposed changes.

It is apparent many surrounding residents may not be fully aware of the curfew conditions and the various types of aircraft movements that occur within the restricted hours. Community understanding could be enhance by sharing of flight traffic information in a user friendly and accessible way. This would be particularly useful in the event that a cap were to be applied to the number of jet landings.

#### **2. Removing the ability of non-emergency helicopters and propeller driven aircraft to operate during the curfew**

Council is supportive of this amendment. Council agrees that non-emergency movements subject the community to additional aircraft noise during the curfew period, above a level that is permitted at other airports.

This amendment would benefit the surrounding community by removing a source of noise during the curfew period, while not impacting the ability for emergency services to be provided to the wider community.

Given the stated benefits of removing the ability of these particular helicopters and aircraft to operate during the curfew, Council would be supportive of this amendment being implemented as soon as practically possible, and would appreciate advice from the Department on when this change would come into effect.

### **3. Allowing jet aircraft, which meet strict noise criteria to land during the curfew period**

Council considers the implications from this amendment are unclear, and a proper understanding of the potential impacts cannot be formed based on the information provided.

There is limited justification for this amendment by the Department in the Public Consultation Paper, with the changes principally benefitting business jet operators and the users of those business jets. In regard to the potential impacts of this amendment, the Public Consultation Paper suggests (p. 6) that *“The public will benefit from having more services at Essendon Airport. Additional services will also contribute to employment and business opportunities on and near the airport and within the region.”*

An economic assessment or analysis has not been provided, and therefore the extent of the suggested increase in economic or business opportunities has not been quantified. The absence of a social and economic impact assessment leaves the community and stakeholders unable to make a suitably informed assessment of this component of the amendment.

Council would have a greater degree of comfort in regard to this proposed amendment if:

- Analysis was provided on the economic benefits, explaining how the benefits potentially balance out the amenity impacts, and whether there will be a net community benefit.
- The number of jet movements (landings) were capped at the level of flights that would not occur as a result of Amendment no.2.

### **4. Conclusion**

Council is committed to the economic development of the City of Moonee Valley, and more clearly articulated economic benefit would assist in understanding if the proposed amendments facilitate this outcome.

Council’s preference is for further assessment be undertaken by the Department to better understand the potential positive and negative impacts of the proposed amendments to the Air Navigation (Essendon Airport) Regulations 2001, and for this analysis to be made available to the community and Council.

In summary, Council is supportive of removing the ability of non-emergency helicopters and propeller driven aircraft to operate during the curfew (Amendment no.2), however Council believes that insufficient information has been provided in relation to Amendment no.1 and Amendment no.3 to allow for a clear position to be formed on these particular changes.

It would be appreciated if the Department could respond to the matters raised in this submission prior to advancing the proposed changes further.