

**FOI**

**From:** s22(1)(a)(ii) @ABF.GOV.AU>  
**Sent:** Wednesday, 27 January 2021 9:28 AM  
**To:** s22(1)(a)(ii)  
**Cc:** s22(1)(a)(ii); s22(1)(a)(ii); s22(1)(a)(ii)  
**Subject:** RE: Moorabbin Airport exposure draft Master Plan 2021 [SEC=OFFICIAL]

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**OFFICIAL**

Good morning s22(1)(a)(ii)

Thank you for consulting with the Department of Home Affairs (Home Affairs), Australian Border Force (ABF) and the Australian Federal Police (AFP) on the exposure draft Master Plan (edMP) for Moorabbin Airport.

Home Affairs, ABF and AFP have no concerns with the edMP, however we note the following:

- The edMP does not appear to foreshadow the introduction of international services (passengers and cargo).
- Should Moorabbin Airport seek to introduce international services (passenger and/or cargo), or to establish an international airport terminal, this would need to be considered by Government under the Government's approval framework for the provision of border services at new and redeveloping ports, to determine whether a proposal is in the national interest, and to ensure that appropriate infrastructure, facilities and resourcing can be provided.

Happy to discuss our comments with you.

Kind regards,

s22(1)(a)(ii)  
 A/g Assistant Director | Ports Policy Section  
 Traveller Policy and Industry Engagement Branch  
 Industry and Border Systems Group | Australian Border Force  
 P: 02 s22(1)(a)(ii) | M: s22(1)(a)(ii)  
 E: s22(1)(a)(ii) @abf.gov.au

The Department of Home Affairs and the Australian Border Force acknowledges the Traditional Custodians throughout Australia and their continuing connection to land, sea and community. We pay respect to all Aboriginal and Torres Strait Islander peoples, their cultures and to their elders past and present.



s22(1)(a)(ii)



**Australian Government**  
**Department of Agriculture,  
 Water and the Environment**

s22(1)(a)(ii)

Assistant Director  
 South East Airports and Economic Regulations  
 Department of Infrastructure, Transport, Regional Development and Communications  
 GPO Box 594  
 CANBERRA ACT 2601

Dear s22(1)(a)(ii)

### **Moorabbin Airport exposure draft Master Plan 2021, Melbourne, Victoria**

Thank you for your email on 5 January 2021 seeking comments on the exposure draft of the Moorabbin Airport Master Plan 2021 (draft Master Plan). Although it is not a statutory requirement, I appreciate that you have provided the Department of Agriculture, Water and the Environment (the department) with this opportunity to comment.

The department notes that the draft Master Plan states that flora and fauna values of the site are very low, consistent with the modified landscape and land use history, and that no species listed under Victorian legislation or the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) have previously been identified within the boundary of Moorabbin Airport. The draft Master Plan states that ecological surveys will be considered or undertaken where appropriate in new areas of development, and future plantings at the airport will be chosen from a Preferred Plant Register due to non-bird attracting features.

While the department considers this approach is suitable, the department notes that a number of matters protected under the EPBC Act have been identified as potentially occurring at or nearby Moorabbin Airport which should be considered in the context of the supplied aviation growth forecasts and non-aviation development plans. These include the Edithvale-Seaford Wetlands (Ramsar wetlands) which support a range of listed and threatened avifauna and internationally protected migratory birds, including but not limited to the Curlew Sandpiper (*Calidris ferruginea*), Australasian Bittern (*Botaurus poiciloptilus*), and an ecologically significant proportion of the population of the Sharp-tailed Sandpiper (*Calidris acuminata*).

The draft Master Plan states that a major airfield upgrade of over 10 km of Light Emitting Diode (LED) lighting is planned for Moorabbin Airport within the next eight years. The department considers that the Airport Environment Strategy should address the potential for any artificial lighting upgrades, in particular use of lighting known to emit short wavelength blue light, to impact on wildlife including nocturnal and migratory avifauna. The department's *National Light Pollution Guidelines for Wildlife Including Marine Turtles, Seabirds and Migratory Shorebirds, Commonwealth of Australia 2020* sets out best practice lighting design and steps involved in assessing potential impacts of artificial light on wildlife, and can be found at: <https://environment.gov.au/biodiversity/publications/national-light-pollution-guidelines-wildlife>

The draft Master Plan states that ground-based operations and activities at Moorabbin Airport contribute air emissions and pollution, though these are considered lower than those from neighbouring off-site sources such as roads. These operations and activities also have the potential for off-site noise impacts. The draft Master Plan includes a commitment to regular servicing of equipment, inspections of construction sites, as well as regular monitoring, reporting, training and awareness, and consultation and communication under Moorabbin Airport's current management practices. Environmental Site Reviews are proposed to assess compliance with relevant legislation and opportunities to improve air emissions at the airport. The department considers this a suitable approach to managing air quality and noise impacts.

The department considers that the draft Master Plan is broadly appropriate in its approach to PFAS identification and management and contains text with an appropriate level of commitment to the ongoing investigation, management and remediation of PFAS contamination. It contains a general commitment to the management of PFAS in accordance with the PFAS National Environment Management Plan (HEPA 2020) (NEMP), and an Environmental Site Register including 'potential, actual and remediated sites'. The department considers that an explicit commitment to management of PFAS contaminated soil stockpiles would make clear that stockpile management would take account of specific guidance in the NEMP. The department recommends that where applicable, any reference to the NEMP should refer to the document version and acknowledge that it may be amended, to allow for future updated versions of the NEMP.

The department recommends a commitment that investigations of contamination be conducted in accordance with the *National Environment Protection (Assessment of Site Contamination) Measure 1999* and an explicit commitment to the progressive reduction in extant pollution at the airport as required by 5.02B(2)(b) of the *Airports Regulations 1997*. The department considers that the draft Master Plan would also benefit from a summary of known contamination (PFAS and other) including provision of maps and citations of reports on contamination investigations to aid in communication.

Attached general PFAS advice is intended to assist in future activities that may result in PFAS mobilisation (Attachment A).

The department anticipates that future Major Development Plans for Moorabbin Airport will be referred under section 160 of the EPBC Act for advice on potential environmental impacts.

If you have any questions about the matters discussed in this letter, please don't hesitate to contact s22(1)(a)(ii) by email at s22(1)(a)(ii) [@awe.gov.au](mailto: @awe.gov.au).

Yours sincerely  
s22(1)(a)(ii)

Acting Director  
Victoria and Tasmania Assessments Section  
Environment Assessments (Vic, Tas) and Post Approvals Branch  
27 January 2021

**Attachment A****Department of Agriculture, Water and the Environment (DAWE): General advice on per-and poly-fluoroalkyl substances (PFASs)**

Proponents that are undertaking activities in areas where there are or may be PFAS chemicals should ensure they have:

- an understanding of the extent and levels of PFAS contamination;
- an assessment of possible risks, and, if risks are identified;
- appropriate management and waste disposal strategies.

The steps would generally follow the below approach:

- a proponent should identify if PFASs are known or likely to be present at the site. The *National Environment Protection (Assessment of Site Contamination) Measure 1999* outlines procedures for this, which should include a desktop historical review of past practices.
- if PFASs are known to be or likely to be present, a document outlining the proposed approach to managing PFAS should be developed prior to the commencement of construction or other works which have the potential to disturb areas of known or potential PFAS contamination.
- the document outlining PFAS management should be part of the CEMP and should include:
  - Identification of the extent and concentrations of possible contamination within the project footprint,
  - Identification of possible exposure pathways and ecological receptors including from stored material,
  - Identification of possible risks tailored to the identified concentrations, pathways and receptors, and
  - An outline of management strategies to be undertaken, as well as any remediation action plans or strategies, to manage any identified or potential risks.

**Advice specific to Airport Lessees: Major Development Plans (MDPs) and Construction Environment Management Plans (CEMPs)**

More detailed steps are set out below.

1. A Tier 1 Preliminary Site Investigation that meets the requirements of the *National Environment Protection (Assessment of Site Contamination) Measure 1999* (ASC NEPM) should be conducted (see **Figure 1**). This should, amongst other things, include a desktop historical review of past practices. Other site investigations and

assessments should, when required, be conducted in accordance with the requirements of Schedules A and B in the ASC NEPM.

- a. Guideline values, investigation levels or screening levels should have regard to the specific environmental values and characteristics of the site, drawing on relevant guidance<sup>1</sup> in consultation with the environmental regulator. It is important to note that regulators may specify, or environmental legislation may prescribe, the level of protection required.
  - b. Selection of these triggers for investigation should be based on a robust analysis of source-receptor pathways and should have regard for the most sensitive receptors and environmental values on and off-site<sup>2</sup>.
2. If site investigations and assessments confirm the presence of PFASs, or if PFASs are likely to be encountered during construction or ongoing operations at the site, the MDP should commit to the development of a Construction Environmental Management Plan (CEMP) that contains a section or a separate document on PFAS management.
  3. The MDP should explicitly state that the CEMP will contain procedures that must be followed for assessing and managing contamination of soil and water by PFASs.
  4. The MDP should also state that the CEMP will be developed and implemented prior to the commencement of any horizontal or vertical construction or other works that have the potential to disturb areas of known or potential PFAS contamination.
  5. The PFAS management section in the CEMP should:
    - a. be consistent with The *National Water Quality Management Strategy*, including the *Australian and New Zealand Guidelines for Fresh and Marine Water Quality*,
    - b. be consistent with the *PFAS National Environmental Management Plan 2.0* (HEPA 2020), including its guideline values, as amended from time to time.
    - c. set out:
      - i. project scope and boundaries,
      - ii. roles and responsibilities,
      - iii. the site conceptual model – including maps and any monitoring data – identifying the extent and concentrations of possible contamination within the project footprint and nearby,
      - iv. possible exposure pathways and ecological receptors - both directly within the project area and also from the project area to any nearby receptors,

<sup>1</sup> ASC NEPM, PFAS NEMP and other relevant guidance (eg, Australian sediment and water quality guidelines)

<sup>2</sup> For managing site-specific PFAS contamination, a site-specific conceptual site model (CSM) needs to consider the source area, off-site transport, relevant exposure pathways, potential receptors and any relevant environmental values (HEPA 2020).

- v. the site-specific risk assessment that identifies possible risks tailored to the reported or expected PFAS concentrations, exposure pathways, and potential receptors on and off the project area,
  - vi. procedures for the management or remediation of PFAS contamination within the project area,
  - vii. strategies to reduce runoff and migration of contamination within and off the proposed project area,
  - viii. operational procedures for managing earthworks and the stockpiling or storage of contaminated water / soil / rock / concrete / tarmac / etc, including in relation to encapsulation, bunding, leachate control and disposal,
  - ix. if necessary, a contingency action plan for unexpected PFAS contaminant discoveries,
  - x. any one-off or ongoing soil, water, and / or biota monitoring requirements and testing procedures, and their relevant QA/QC procedures<sup>3</sup>.
- d. impose the following requirements:
- i. any PFAS contaminated material (including but not limited to excavated soil or sediment, leachate from soil or sediment, water arising from de-watering of soil or sediment, concrete, tarmac, appliances, pumps, pipes, hoses, fittings) must be handled appropriately and disposed of in an environmentally sound manner such that potential for the PFAS content to enter the environment is minimised; and
  - ii. any PFAS contaminated material with a PFOS, PFHxS or PFOA content above 50 parts per million (ppm) – that is, milligrams per kilogram or litre (mg/kg or L) – must be stored or disposed of in an environmentally sound manner that will achieve nil environmental release of their PFAS content.
- e. detail how materials at the concentrations listed at d(ii), if encountered, would be handled to achieve zero environmental release.
6. PFAS-related documentation, including any desktop historical review, Preliminary / Detailed Site Investigation, CEMP, or PFAS Management Plan should be published on a web site. Consideration should be given to auditing of these documents by a suitably qualified independent contaminated sites auditor.

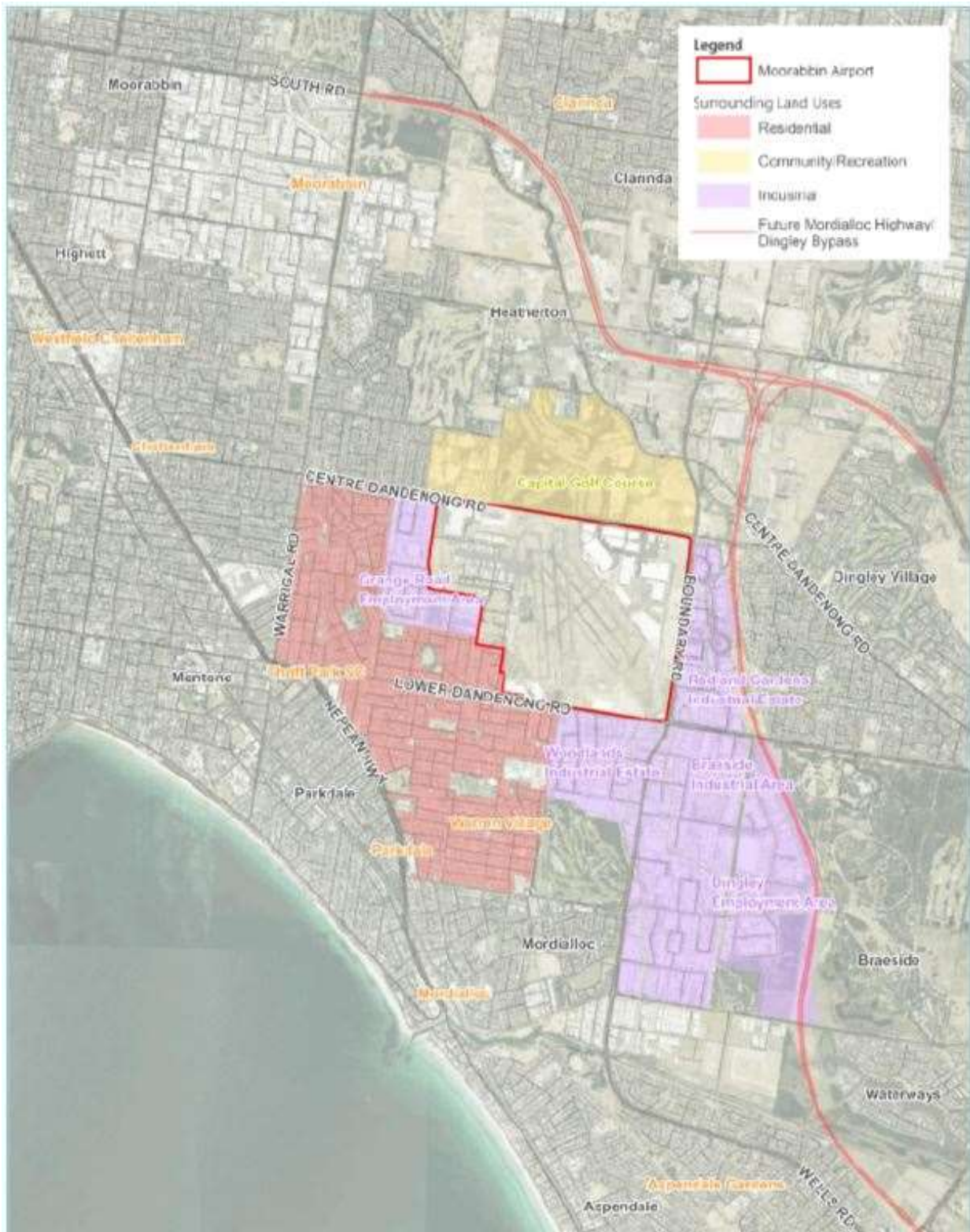
<sup>3</sup> Such as, US EPA Method 537.1, US EPA Method EPA-821-R-11-007; and US DoD and US DoE QSM 5.1 (2017). See HEPA (2020:89) for guidance.

## Glossary

Action	a project, development, undertaking, activity, or series of activities, or an alteration to any of those things. Actions may include but are not limited to: construction, expansion, alteration or demolition of buildings, structures, infrastructure or facilities; industrial processes; mineral and petroleum resource exploration and extraction; storage or transport of hazardous materials; waste disposal; earthworks; impoundment, extraction and diversion of water; agricultural activities; aquaculture; research activities; vegetation clearance; culling of animals and dealings with land. Actions encompass site preparation and construction, operation and maintenance, and closure and completion stages of a project, as well as alterations or modifications to existing infrastructure.
Business day	a day that is not a Saturday, a Sunday, or a public holiday in the state or territory of the action.
CEMP	Construction Environmental Management Plan.
Commence	in relation to the action, means the first instance of any activity associated with the action including the clearance of vegetation, construction of infrastructure and any works that have the potential to disturb areas of known or potential PFAS contamination. 'Commence' does not include minor physical disturbance necessary to: <ul style="list-style-type: none"> <li>i. undertake pre-clearance surveys or monitoring programs; or</li> <li>ii. install signage or temporary fencing to prevent unapproved use of the development site; or</li> <li>iii. if agreed in writing by the Environment Department, protection of MNES, environmental values, or environmental and property assets from fire or weeds and other pests by installing fencing and signage or by maintaining or using existing access tracks.</li> </ul>
Environment Department	the department of state administered by the Environment Minister.
Environment Minister	the Minister administering the <i>Environment Protection and Biodiversity Conservation Act 1999</i> , and includes a delegate or agent of the Minister.
PFAS	a per- or poly-fluoroalkyl substance.
PFASs	per-and poly-fluoroalkyl substances. Per-and poly-fluoroalkyl substances include PFOS (perfluorooctane sulfonate), PFOA (perfluorooctanoic acid), PFHxS (perfluorohexane sulfonate), and their direct and indirect precursors. Precursors and other PFASs can contribute over time to the total PFAS load in the environment and should be considered to the fullest extent possible. Appropriate analytical methods, including limits or reporting, are discussed in the PFAS NEMP (HEPA 2020: 88–94). For the purposes of this project, where the identity of PFOS, PFOA, and PFHxS precursors are unknown a standard suite of 23 analytes may be used for the measurement of the sum of PFASs and may be reported, for example, as 'Sum of PFASs (n=23)'.

PFHxS	perfluorohexane sulfonate.
PFOA	perfluorooctanoic acid.
PFOS	perfluorooctane sulfonate.
Project area	the site boundary as identified on the map at <b>[Figure 1]</b> .
Website	a set of related web pages located under a single domain name attributed to the airport lessee and available to the public.

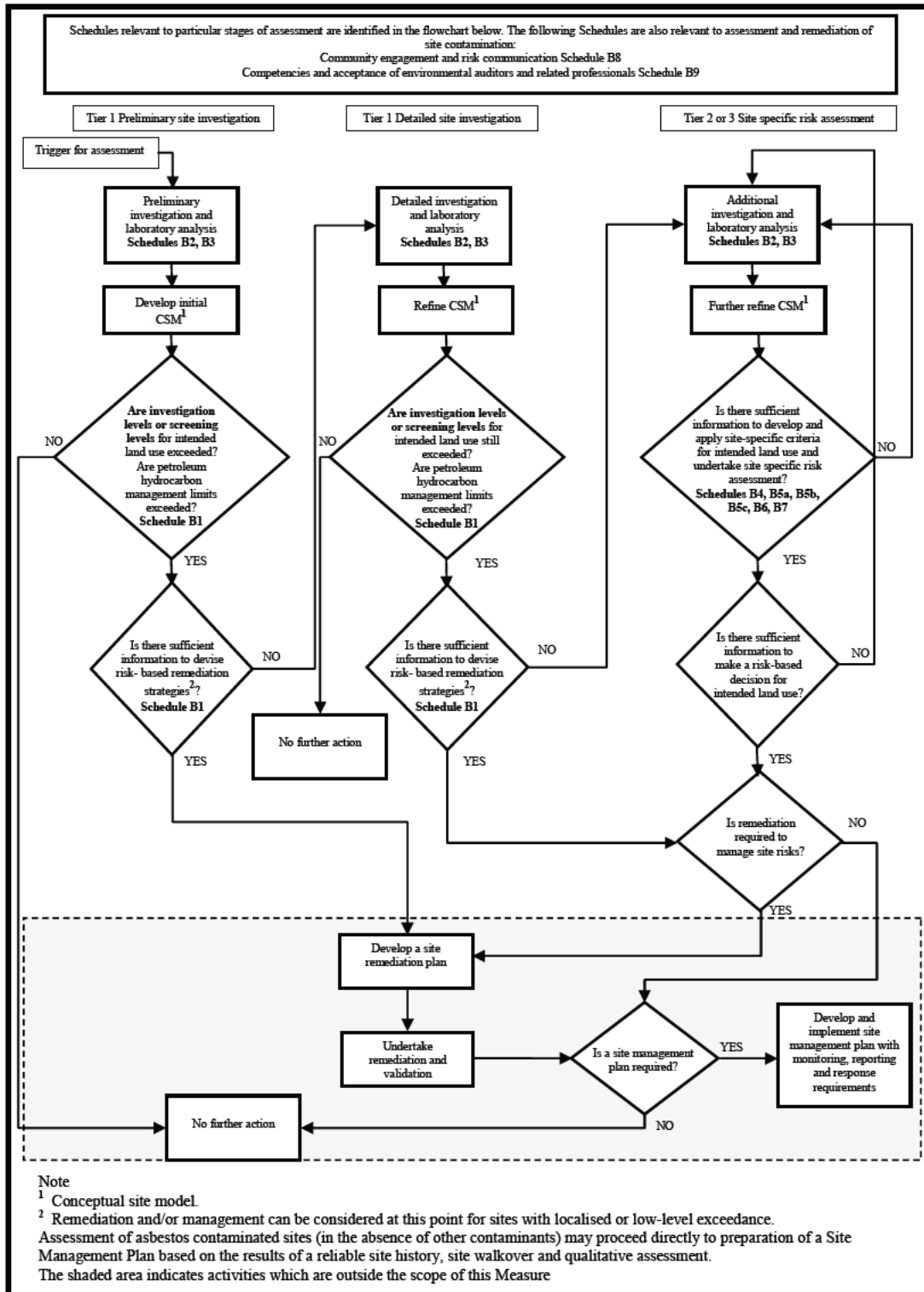




**Figure 1-A:** Map of site location, showing surrounding land use (source: Moorabbin Airport exposure draft Master Plan 2021: Fig. 8.6).

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**Figure 1:** Recommended general process for assessment of site contamination (Source: [Federal Register of Legislation](#) ASC NEPM 1999 registered 03 June 2013, Start Date 16 May 2013 (Volume 1, s 1-6, Schs A and B, page 14).

<sup>4</sup> Note: For PFAS soil guideline values traditional land use categories are not relevant to ecological risks, and therefore a single guideline value is now applicable to all land use scenarios (HEPA 2020).

<sup>5</sup> Note: Intended land use includes potential on and off-site use of materials (including but not limited to soil, water, sediment, etc.)

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**Airports and Environment**

25 Constitution Ave  
Canberra ACT 2600

[www.airservicesaustralia.com](http://www.airservicesaustralia.com)

ABN 59 698 720 886

28 January 2021

s22(1)(a)(ii)

GPO Box 594  
Canberra  
ACT 2601

Ref: *YMMB-MP-2021e*

Dear s22(1)(a)(ii)

### **Moorabbin Airport exposure draft Master Plan (edMP)**

I refer to your letter dated 5 January 2021 advising Airservices of the Moorabbin Airport exposure draft Master Plan (edMP).

Our assessment of this edMP has not identified any significant issues for Airservices and we support the edMP proceeding to public consultation.

Airservices reserves the right to complete a formal detailed assessment of the preliminary draft Master Plan (MP) during the public consultation period. I recommend that when a preliminary draft MP is prepared and released for public comment, a copy is forwarded to Airservices ([airport.developments@airservicesaustralia.com](mailto:airport.developments@airservicesaustralia.com)) at the time of its release.

#### **Airspace Procedures**

All Airservices-designed procedures must be protected for future infrastructure developments. Airservices must be notified about any building developments (and the use of associated construction equipment), to ensure that they will not pose a hazard to aircraft operations and that all Airservices designed procedures are safe for aircraft operations. Visual Segment Surfaces (VSS) corresponding to approaches to the runways must be protected from building heights. The height of buildings or other developments must not penetrate the VSS.

Airservices must be notified of any changes that affect information on the published Departure and Approach Procedures (DAP) charts, such as the configurations of airport manoeuvring areas, taxiways and apron layouts.

#### **Community Engagement**

In Section 12.3.1 Noise Abatement Measures, only the telephone number for Airservices Noise Enquiry Service is provided. The telephone number may change and the operating hours are limited. Therefore, Airservices prefers the document refers to our webpage which has all the contact methods available:

<https://www.airservicesaustralia.com/community/environment/aircraft-noise/about-making-a-complaint/>

#### **Development Activity**

The proposed use of any plant or cranes required for the construction of any proposed developments associated with this edMP will require separate consultation between the airport, the proponent(s) and

Airservices, prior to construction commencing, to ensure there are no impacts on Airservices facilities or operations.

If you require any additional information or wish to discuss any aspect of this letter further, please do not hesitate to contact my colleague s22(1)(a)(ii), on 03 s22(1)(a)(ii), or by email on [airport.developments@airservicesaustralia.com](mailto:airport.developments@airservicesaustralia.com).

Yours sincerely,

s22(1)(a)(ii)

s22(1)(a)(ii)

s22(1)(a)(ii)

Senior Advisor Airport Development

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**Australian Government**  
**Civil Aviation Safety Authority**

AIR NAVIGATION, AIRSPACE AND AERODROMES

*File Ref: F15/4269-1*

5 February 2021

Mr Phil McClure  
 Assistant Secretary, Airports Branch  
 Department of Infrastructure, Transport, Regional Development and Communications  
 GPO Box 594  
 CANBERRA ACT 2601

Dear Mr McClure

**Moorabbin Airport – 2021 exposure draft Master Plan (edMP)**

I refer to your request seeking comment from CASA on the Moorabbin Airport edMP prepared by the operator, Moorabbin Airport Corporation (MAC).

Airside infrastructure

The edMP indicates there will be no changes to runway and taxiway infrastructure during the immediate eight-year planning cycle. The document advises the existing runway and taxiway infrastructure is adequate to handle the aircraft type mix and movement volumes.

CASA notes the document variously refer to the airport having five and ten runways. For consistency, CASA recommends that the document refers to five runways.

CASA seeks engagement with DITRDC to understand the aviation facilities development plan. The plan appears to propose, among other things, additional hangars and aviation facilities in the vicinity of runways.

CASA notes the proposal to change the code number of Runway 17L/35R from Code 3 to Code 2 and the code number of Runway 17R/35L from Code 2 to Code 1. CASA seeks engagement with DITRDC to discuss this proposal.

CASA advises that it is not entirely accurate to suggest that Code 3 runways are required only by larger aircraft types. CASA would appreciate advice on the basis of the statement that the runways are constructed for light GA and have an MTOW rating of 5,700kg. CASA notes that MAC has previously identified Code 3C aircraft as being suitable for operations at the airport.

CASA would appreciate an expanded discussion on why MAC consider that safety issues would arise when Code C aircraft are scheduled with smaller aircraft types.

CASA takes the opportunity to commend MAC for its initiatives to reduce the rate of runway incursions.

CASA commends MAC for identifying the potential for urban developments in the prescribed aerial training area to affect training operations. CASA recommends that DITRDC engage with the Victorian Government through NASAG regarding land use planning policies to safeguard aircraft operations in the prescribed aerial training areas.

#### Safeguarding matters

CASA notes the potential for significant expansions in non-aviation development.

CASA recommends that DITRDC should take the lead in obtaining an understanding of potential safeguarding implications. In 2017, CASA worked with MAC regarding the potential for building induced wind effects to affect aircraft operations.

CASA notes the proposal to amend prescribed airspace to accommodate potential developments. Given the potential expansion plans, CASA recommends that DITRDC should provide policy guidance to all stakeholders on safeguarding implications.

Yours sincerely,

s22(1)(a)(ii)



Acting Branch Manager



Hon Richard Wynne MP

Minister for Planning  
Minister for Housing

8 Nicholson Street  
East Melbourne, Victoria 3002

Mr Paul Ferguson  
Chief Executive Officer  
Moorabbin Airport Corporation  
66 Bundora Parade  
MOORABBIN AIRPORT VIC 3194

Ref: MBR045629



Dear Mr Ferguson

**MOORABBIN AIRPORT PRELIMINARY DRAFT 2021 MASTER PLAN – WHOLE OF VICTORIAN GOVERNMENT RESPONSE**

Thank you for providing the Moorabbin Airport Preliminary Draft 2021 Master Plan (draft master plan) to the state for comment, further to the requirements of the *Airports Act 1996*.

The Victorian Government welcomes the opportunity to reinforce the significance of Moorabbin Airport to the state's economy. As the draft master plan states, Moorabbin Airport is Australia's second busiest airport and leading training airport. The Department of Environment, Land, Water and Planning (DELWP) has coordinated a Whole of Victorian Government response to the draft master plan in consultation with relevant departments and agencies to inform its further development (refer response attached).

The State is broadly supportive of the draft master plan. The draft master plan is consistent with Victorian Government policy to support major transport gateways, such as Moorabbin Airport, as important locations for employment and economic activity. However, references in the draft master plan to Moorabbin Airport as an activity centre are inconsistent with the metropolitan planning strategy, *Plan Melbourne 2017-2050*, which does not identify the airport as an activity centre.

Moorabbin Airport is a State-significant Transport Gateway, as designated in *Plan Melbourne*. State planning policy supports appropriate aeronautical and non-aeronautical development on airport sites, providing it is consistent with their aviation operations and does not affect their operational safety and efficiency.

In providing broad support for the preliminary draft master plan, I note that it remains the responsibility of the Moorabbin Airport Corporation (MAC) and relevant Commonwealth regulators to ensure any development on federally leased airport land complies with all applicable legislation, standards, and guidelines. This includes the management of any environmental impacts, including contaminants, on site, as well as addressing the National Airports Safeguarding Framework principles and guidelines.

Other matters raised in the Whole of Victorian Government response for your further consideration include:

- night-time aircraft noise contours
- consistency with *Plan Melbourne 2017-2050*
- climate change risk and vulnerability
- native vegetation removal requirements
- consistency of investment figures
- reduction of the airport's Ultimate Practical Capacity



- ground transport projects and objectives
- community engagement relating to aircraft noise.

I understand that MAC has also requested additional time beyond the formal, now concluded consultation period before submitting the draft master plan to the Commonwealth. The state looks forward to discussing the matters raised in this response with the MAC before finalisation of the draft master plan for submission to the Hon Barnaby Joyce MP, Federal Minister for Infrastructure, Transport and Regional Development, for approval.

If you would like more information about this matter, please contact s22(1)(a)(ii) Manager Statutory Policy, Planning Systems Reform, DELWP, on s22(1)(a)(ii) or email s22(1)(a)(ii) [@delwp.vic.gov.au](mailto:s22(1)(a)(ii)@delwp.vic.gov.au).

Yours sincerely

**HON RICHARD WYNNE MP**  
Minister for Planning

19/9/21

Encl.

# Whole of Victorian Government Comments Moorabbin Airport Preliminary Draft Master Plan 2021

Chapter	Theme	Comments
General Comments	Land use Planning, Safeguarding, and Consistency with the Victoria Planning Provisions and State Planning Policy	<ul style="list-style-type: none"> <li>○ In line with the <i>Airports Act 1996</i>, Moorabbin Airport Corporation (MAC) has notified and sought comments from the Minister for Planning and Secretary, Department of Environment, Land, Water and Planning (DELWP) on the Moorabbin Airport Preliminary Draft 2021 Master Plan (preliminary draft master plan). DELWP has coordinated and prepared the whole of Victorian Government response to the preliminary draft master plan.</li> <li>○ Moorabbin Airport is state-significant infrastructure, and a designated state-significant transport gateway under Victoria's Metropolitan Planning Strategy: <i>Plan Melbourne 2017-2050</i>. It is Victorian Government policy to support major transport gateways as important locations for employment and economic activity. The state is responsible for ensuring the planning framework surrounding the airport protects the airport's ongoing operation consistent with this designation.</li> <li>○ State Planning Policy supports appropriate aeronautical and non-aeronautical development on airport sites, providing it is consistent with their aviation operations and does not affect their operational safety and efficiency.</li> <li>○ The Minister for Planning has appointed the Melbourne Airport Environs Safeguarding Standing Advisory Committee (the Committee) to review the planning provisions protecting Melbourne and all airports, to ensure they remain effective in safeguarding airports from inappropriate use and development on surrounding land. The Committee will also advise the Minister on the further implementation of the National Airports Safeguarding Framework (NASF) in all relevant planning schemes. The state notes MAC's participation in the Committee's submission process.</li> <li>○ It is the responsibility of relevant Commonwealth regulators and MAC as the airport operator to ensure the preliminary draft master plan and any use or development enabled by the preliminary draft master plan is sited and implemented appropriately, and in compliance with any applicable or relevant legislation, standards and guidelines. These include the Commonwealth airspace, noise and environment related regulations, management of any PFAS on site, and assessment against NASF Guidelines.</li> <li>○ The preliminary draft master plan, as with previous draft master plans and the current master plan, makes the point numerous times the airport is on Commonwealth land and as such is not bound by the state planning framework. However, it still seeks to be included within the Urban Growth Boundary (and not the Green Wedge) on the basis of consistency with, for example, Essendon Fields Airport and designated activity centres that are subject to the state planning scheme. Following previous Urban Growth</li> </ul>

# Moorabbin Airport Preliminary Draft Master Plan 2021

Boundary reviews, Plan Melbourne reaffirms that Moorabbin Airport is outside the Urban Growth Boundary and recognises that green wedges support a range of uses and critical infrastructure, such as airports.

- The green wedge provides Moorabbin Airport with significant protection from incompatible land use and development. While the airport is not zoned green wedge, the preliminary draft master plan could be improved by recognising the important buffer role the green wedge provides the airport and its environs. The Victorian Government is consulting on the strengthening of planning for Melbourne's green wedges and agricultural land, which include buffers for aviation assets within their environs.
- This protection is vital to the airport's State-significant Transport Gateway status, given the airport is, as highlighted in the preliminary draft master plan:
  - Australia's busiest training airport, and
  - since approval of the current Moorabbin Airport Master Plan 2015, the second busiest airport in the country.
- The proposal in the preliminary draft master plan to potentially allow sensitive uses, such as aged care facilities, is inconsistent with the principles of NASF and state policy to protect Moorabbin Airport's ongoing operation. Please note, the State is unlikely to support future sensitive uses on airport land for these reasons.
- The State continues to support Moorabbin Airport as a state significant transport gateway where adjacent complementary uses and employment-generating activity will be encouraged. Moorabbin Airport is not listed as an activity centre in Plan Melbourne, therefore the state does not support the proposed application of the Activity Centre Zone to Precinct 4 in the preliminary draft master plan. The existing commercial zoning would be more appropriate for this precinct.
- The State notes that given the impending translation of the Kingston Planning Scheme into the new format Planning Policy Framework (PPF), references to local planning policies that are already captured by state and regional policy will become redundant. The PPF translation is being finalised as at the time of these comments.
- The Victorian State Government supports the use of ultimate concept ANEF for all of Victoria's Commonwealth-leased airports, consistent with the National Airports Safeguarding Framework (NASF). The impact of aircraft noise is among several key considerations for the Victorian State Government in safeguarding Moorabbin Airport's environs to support its ongoing operations. An approved, updated ANEF and advice from the Committee will inform future changes to the planning scheme provisions safeguarding Moorabbin Airport's environs through the Kingston Planning Scheme.
- The State Government's Melbourne Industrial and Commercial Land Use Plan (MICLUP) supports State and local government to plan more effectively for future employment and industry needs. Moorabbin Airport is identified as a regionally-significant industrial precinct in the MICLUP. The site's designation as a regionally-significant industrial precinct is on the basis of its importance to protect the airport's ongoing operations, which has been a long-held policy position of the State Government. This is consistent with '*Criterion 1: Policy Alignment*' included in the MICLUP.
- The State appreciates MAC's engagement on aeronautical and non-aeronautical development through the Moorabbin Airport Planning Consultation Group (PCG) and related processes. While the state has no formal status as a referral authority under Commonwealth legislation, consultation on proposals, irrespective of whether they meet the Airports Act major development plan

# Moorabbin Airport Preliminary Draft Master Plan 2021

threshold, is appreciated and in keeping with the intent of the Moorabbin Airport PCG and the State's implementation of NASF. The State would welcome further articulation in the preliminary draft master plan of ongoing communication and community engagement mechanisms that exist beyond the Moorabbin Airport CACG.

- The preliminary draft master plan refers to Planning Consultation Group membership including 'the Victorian Government, and representatives from the Victorian Department of Environment, Land, Water and Planning, the Victorian Department of Transport and VicRoads'. Please note, VicRoads now forms part of the Department of Transport and there are no Victorian Government members (i.e. Members of Parliament or Ministers) on the Planning Consultation Group.
- The State encourages MAC to strengthen meaningful engagement with State departments and agencies on matters raised in this submission (and state comments provided on previous draft master plans for the airport on these same planning-related themes) requiring further clarification, and on future matters, as part of the PCG.
- Please note, the Victorian Planning Authority is currently not involved in strategic planning for precincts/areas within proximity to Moorabbin Airport.

## Natural environment and climate change

- The preliminary draft master plan focuses on landscaping and replacing any removed tree with three others on site. It does not specifically refer to the avoid, minimise, and offset requirements of the State's native vegetation removal regulations, however it does commit to being consistent with local planning schemes.
- The State supports the emissions reduction targets and the existing and planned initiatives outlined in the master plan, including 100 per cent renewable energy and carbon neutral operations by 2025. The State also supports the development of robust and transparent emissions reporting to enable the accreditation and communication of these targets.
- The preliminary draft master plan addresses broader sustainability concerns with attention given to increasing vegetation cover, water conservation, developing active transport options, and supporting community involvement. The State notes that these intentions are aligned with climate change adaptation goals, and that potential synergies between these actions could be further articulated and developed (such as managing increased vegetation cover and planning for active transport pathways in tandem to ensure cool walkways on hot days).
- Given the implementation timeframe of 20 years, the State recommends the preliminary draft master plan include a climate change risk and vulnerability assessment, and adaptation plan for the site and operations, that considers physical and transition risks to the airport over that period. 'Victoria's Climate Science Projections 2019' may be a useful resource to identify relevant climate hazards to support such an assessment. Such an assessment and adaptation plan would allow the airport to meet the master plan's stated objectives to monitor and manage the effects of a changing climate on the airport. The State would like to be involved in any subsequent environmental management planning for the site in relation to:
  - ensuring that the development plan reasonably satisfies the requirements of any relevant State and Commonwealth Acts that may apply to the protection and enhancement of onsite and offsite ecological values.

# Moorabbin Airport Preliminary Draft Master Plan 2021

- identifying opportunities to enhance ecological connectivity across the site and surrounds.
- the development of measures to mitigate potential impacts to any onsite and offsite natural values.

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## Ultimate practical capacity and flight training

- It is noted that the Ultimate Practical Capacity has been reduced from 650,000 movements per year to 375,000 movements per year. The State understands that this reduction is due to ensuring safe operations where a large number of the movements are attributed to student training aircraft movements.
- However, due to the economic activity generated by the airport, the State will not support further reduction in Ultimate Practical Capacity unless, and until, the concerned departments are fully briefed on the further reductions and the strategic rationale behind the decision.
- The State encourages protection of the Ultimate Practical Capacity through investment in safety technology and process, and effective use of planning controls to protect against developments that may impact on airport operations and, supports the focus on ensuring safe operation of the airport precinct and would encourage the airport to ensure that all developments on and around the airport are in line with these safety considerations, along with the continued adoption and implementation of the NASF guidelines.
- Moorabbin Airport is the leading precinct for pilot training in the Southern Hemisphere, with around 30 per cent of students from abroad. The \$17 million in investment in aviation support facilities since 2015 have led to growth in pilot training. The focus on growth for additional student places and the future investment in Flight Training facilities to support up to 1,800 students is welcomed.

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## Environment Protection Framework

- Update the preliminary draft master plan to consider the new *Environment Protection Act 2017* (as amended by the *Environment Protection Amendment Act 2018*) (EP Act 2017) and associated subordinate legislation.
  - Moorabbin Airport should review its internal guidelines for the preparation of Construction Environmental Management Plans (CEMP) and the Operational Environmental Management Plans (OEMP), and update to include requirements of the new environment protection legislative framework and EPA guidance
  - Recommend that the new Environment Protection Regulations (EP Regulations) and the Environment Reference Standard (ERS) be referenced in the final version of the master plan. The new EP Regulations and ERS can be found on EPA's website at <https://www.epa.vic.gov.au/about-epa/laws/new-laws/subordinate-legislation>
  - Recommend that Moorabbin Airport review its current guidance for the development of CEMPs and OEMPs as they may require updates to reflect the new EP Act legislative requirements, particularly waste duties. It should be noted that EPA publications 480, 960, 1254 (section 2) and 1264 have been superseded by EPA Publication 1834 Civil Construction, Building and Demolition.
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# Moorabbin Airport Preliminary Draft Master Plan 2021

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- Until 1 July 2021, the primary environmental protection legislation is the *Environment Protection Act 1970* (EP Act 1970). The EP Act 1970 was repealed on 1 July 2021.
  - From 1 July 2021, the amended *Environment Protection Act 2017* (EP Act 2017) is in effect. The EP Act 2017 replaced and repealed the EP Act 1970.
  - The subordinate legislation that supports the EP Act 2017 includes:
    - Environment Protection Regulations 2021 (new EP Regulations);
    - Environment Protection Transitional Regulations 2021; and
    - Environment Reference Standard (ERS).
  - It is important to note that on 1 July 2021, the State Environment Protection Policies (SEPPs), which are part of the legal framework under the EP Act 1970, will cease to have effect, (except where transitional provisions explicitly apply). Some content from the SEPPs have been adapted or rehoused. The main instrument in which aspects of SEPPs have been redistributed are the ERS. Some aspects have been included in the new EP Regulations and other aspects were considered by the government to be covered through the new EP Act 2017 (for example through the operation of the general environmental duty (GED)) or better framed as guidance.
  - The GED is a cornerstone of the new EP Act 2017 and introduces a broadscale, positive obligation on 'a person who is engaging in an activity' to proactively prevent and minimise risks of harm to human health and the environment from pollution and waste 'so far as reasonably practicable'. This shifts the current approach of managing impacts after they have occurred, to focussing on preventing harm.
  - Many EPA guidelines will continue to exist and inform the GED, alongside more recent guidelines developed specifically with the new EP Act 2017 in mind.
  - Five EPA publications are incorporated in the regulations and support their operation:
    - Noise limit and assessment protocol (Noise Protocol) (This is for the control of noise from commercial, industrial and trade premises and entertainment venues.) (Publication 1826.4) o New noise boundaries for major urban areas <https://www.epa.vic.gov.au/about-epa/laws/new-laws/summary-of-regulations/summary-of-noise-regulations/new-noise-boundaries-for-major-urban-areas>
    - ESMP data manual 1992: Engine speed at maximum power and noise test engine speeds for vehicles 1970 to 2005 (Publication 317.5)
    - Protocol for calculating monetary benefits (Publication 1727.2)
    - Waste classification assessment protocol (Publication 1827.2)
    - Waste disposal categories - characteristics and thresholds (Publication 1828.2)
-

# Moorabbin Airport Preliminary Draft Master Plan 2021

## Chapter 2: Introduction

### Climate change

- The introduction (p.9) states that Moorabbin Airport has a goal of achieving carbon neutrality by 2025 through its master plan and that 25% of all aviation activity at the airport has already achieved carbon neutrality. Carbon neutrality is only addressed on p.9 and p.34. It is suggested that the carbon neutral ambition is further linked to MAC's other work, for example p.231 current management practices and MAC's assessment of greenhouse gas emissions. Furthermore, it is suggested that MAC's carbon neutral ambitions relationship to other policies and plan is articulated, including how it will be achieved, e.g. is this located within the Moorabbin Airport Green Plan?
- It is suggested that more detail be provided regarding carbon neutrality ambitions. Suggest addressing the following questions for transparency in the decision-making process, particularly in reference to the demonstration of climate change consideration:
  - How will the airport achieve carbon neutrality e.g. steps to reach goal.
  - What has been/ will be implemented to achieve carbon neutrality?
  - How was 25% carbon neutrality thus far achieved?
  - What was the reasoning and context behind this decision?
  - What consideration/evaluation has been done towards transition?

### Investment figures and projections

- The State has identified an inconsistency in the investment figures stated in the Master Plan. On page 20, the Master Plan states: "In the five years since 2015, \$250 million has been invested into the site, resulting in a total investment in the Airport of \$500 million since privatisation in 1998. By 2029 total investment into the Airport will exceed \$800 million."
- However, on page 27, it is stated: "By 2041, Moorabbin Airport forecasts that over \$800 million will have been invested in the Airport."
- The State suggests that page 27 be updated to reflect that while investment to the value of \$800 million is expected by 2029, additional re-investment will be made in the period to 2041 to continue the growth and performance of Moorabbin Airport.

## Chapter 3: Sustainability, Corporate Responsibility and Community

### Climate change

- Suggest rephrasing "reduce carbon emissions and climate change" (p 36 and 39). The wording is problematic as climate change cannot necessarily be reduced, rather you can reduce greenhouse gas emissions, become resilient to climate change or mitigate against climate change impacts. Suggest using terms such as 'improving climate resilience'. Also, throughout document suggest 'reduce carbon emissions' be amended to 'reduce greenhouse gas emissions.'
- Suggest rewording the paragraph (p.33) "Moorabbin Airport implements sustainability initiatives including renewable energy generation, reducing energy consumption, water saving measures, reducing carbon emissions and climate change and responsible waste management." See previous dot point regarding "reducing climate change". There is an opportunity for these initiatives to be attributed towards mitigation of greenhouse gas emissions (rather than 'reducing carbon emissions' being listed as a separate initiative) at the Airport.

# Moorabbin Airport Preliminary Draft Master Plan 2021

- Suggest defining what is meant by sustainability. The terms sustainability/ sustainable outcomes/ sustainable are used constantly throughout the report (see p.12, chapter 3 for example), without providing a clear definition of what is meant by sustainability. Page 35 poses the question: what is sustainability? However, no clear definition is provided and to the reader it is unclear what exactly is being meant by the term and in what context eg. Is sustainability being considered because of climate change?

## Aircraft noise impacts

- On page 46 the master plan notes that the airport will 'encourage home purchasers in the area to conduct due diligence around noise impacts at different times of the day and in different weather events'. It will be important that this is supported by a practical mechanism for prospective home purchasers to conduct this due diligence.

## Moorabbin Airport Green Plan

- Suggest elaborating on the statement "it will continue to monitor how climate change may manifest at the Airport and take prudent steps to mitigate impacts" (p.39). Suggest further information is provided regarding how MAC will continue to monitor climate change impacts.
- Suggest further discussion around the consideration of biofuel for maintenance equipment and vehicles. What does consideration look like e.g. what is being considered-cost, environmental impact? How is consideration demonstrated? There is potential here to consider and discuss transition. (p.30)
- Suggest further detail is given regarding how MAC is "seeking opportunities to mitigate carbon emissions and manage the effects of a changing climate" (p.35). Suggest detailing how this will be considered and what is the threshold for consideration. Furthermore, suggest adding further detail into how opportunities to manage climate change will be sought and the potential for action to be taken.
- Suggest rephrasing and/or reframing the Green Plan for wider focus on climate change (p.38-39). Currently one principle is titled: Reducing carbon emissions and climate change (See terminology feedback). Climate change could also be considered under several other principles of the plan: Renewable energy generation, reducing energy consumption, biodiversity and habitat, water saving measures, building resilience and adaptation, waste management and building material and supply chains. There is opportunity to frame the principles to build climate change resilience in addition to reducing carbon emissions.
- Suggest further opportunities be explored for embedding/ mainstreaming the Green Plan/ climate change consideration into other aspect of the master plan including: Land Use Plan, Non- Aviation Development plan, Ground transport plan, Infrastructure services etc. It may be worth exploring whether there is scope to incorporate climate change consideration in decisions relating to business case development/planning, governance, procurement, and asset management.
- It is noted at p.172 that there has been a review commissioned on expected future transport mode shares. Noting this review may already be underway, there could be scope to incorporate climate change considerations part of this review.



# Moorabbin Airport Preliminary Draft Master Plan 2021

- Suggest clarification of the relationship and interaction between the Moorabbin Airport Green Plan and the Airport Environment Strategy. A suggestion to also further elaborate on the Moorabbin Airport Green Plan and the Airport Environment Strategy role/ position within the master plan and how they interact with the master plan.
- The report details a plan to implement future initiatives (The Moorabbin Airport Green Plan). It is suggested that consideration and evaluation of climate change and climate change risk is demonstrated. It is suggested that MAC provide context detailing work to date on climate change consideration behind their decisions to implement these initiatives.

## Chapter 4: Master Plan Process

### Community engagement

- Given the airport is bounded by residential areas, and runs flights 24/7, effective community engagement and consultation is very important for both the community and the airport.

### Aircraft noise

- Noise generated by airports, particularly noise from aircraft flyover (especially at night), is often an issue for surrounding communities. Moorabbin Airport's noise reduction strategy appears to be significantly reliant on their voluntary Fly Friendly program. This program recommends practical measures for aviation customers to decrease noise impacts on surrounding communities such as using the least noise-sensitive runways, providing a special test area for aircraft maintenance, limiting training hours and flights over residential areas, and promoting the good behaviour of pilots.
- It is not clear what mechanisms exist for community engagement apart from the airport's CACG (Community Aviation Consultation Groups, which include residents affected by airport operations, local authorities, airport, users, and other interested parties). It would be useful for the master plan to articulate other ongoing community communication and engagement mechanisms that exist. If these mechanisms do not exist, the airport is encouraged to establish additional community engagement and consultation mechanisms.

## Chapter 5: Planning Framework and Context

### Consistency with the planning scheme and the airport as an activity centre

- At section 5.5.2 there is a discussion about the Victoria Planning Provisions (VPP) being a template document and a reference to the VPPs being unenforceable. It is unclear what this adds to the preliminary draft master plan. Suggest much of the background content about the VPPs in the opening paragraphs of section 5.5.2 be deleted.
- There are several references to the master plan being the 'planning scheme' for the airport (See Sections 5.5.2 and 5.7 as examples). This is a potentially confusing reference. While the master plan will provide guidance for the use and development of the airport, a master plan is not a planning scheme. This reference should be altered to provide clarity that the master plan acts like, rather than is, a planning scheme for Moorabbin Airport.
- There are multiple references to the airport as being an 'activity centre'. This should be amended to ensure there is no confusion with the terminology used throughout Plan Melbourne 2017-2050. While Moorabbin Airport is identified as a State-significant

# Moorabbin Airport Preliminary Draft Master Plan 2021

Transport Gateway and Moorabbin is identified as a Major Activity Centre in Plan Melbourne, the airport itself has not been identified as being an activity centre in Plan Melbourne.

## Native vegetation

- The preliminary draft master plan should, in section 5, include a commitment to meet the requirements at Clause 52.17 of the Victoria Planning Provisions (VPP) and implement the Guidelines for the removal, destruction and lopping of native vegetation as incorporated within the VPP.

## Transport

- Section 5.5.3 (p.65): Department of Transport (DoT) will continue to engage with MAC regarding the Principal Freight Network (PFN) in “managing existing and proposed freight corridors and places in conjunction with urban form changes is a priority area to improve freight efficiency, capacity and amenity”.
- Section 5.8.3: DoT requests MAC work with DoT to assist with standards and connection of internal roads with external access.

## Chapter 8: Non-aviation Development Plan

### Consistency with State Planning Schemes

- On pg.166 – Section 8.7: Factors listed to justify inconsistencies, the state would prefer to see them as criteria before MAC entertains them as a proposal. Suggest re-wording: *In the event of any inconsistency with State and local planning schemes, this is **must be justified by the following factors.***

## Chapter 9: Ground Transport Plan

### Active transport

- The State is pleased to note the preliminary draft master plan’s support and advocacy for active transport options (public transport, cycling and walking). Active transport makes a significant contribution to public health and wellbeing through increased physical activity and reducing emissions.
- The master plan explains the importance of public transport to the airport, particularly as aviation students and young people working at the airport site are often reliant on public transport to travel to and from the airport. In addition, the contribution of public transport to socially connected, liveable communities and the environmental and economic impacts of sustainable and efficient transport are acknowledged.
- The State is pleased to note that the page 184 of the master plan commits the airport to working with the Department of Transport and the City of Kingston to progress additional cycling routes near the airport and that it will also consider developing new cycling and pedestrian infrastructure (including a new recreational and running track for community use) within the Airport. The master plan also notes that the walking track may also include outdoor gym / exercise stations, outdoor bench and water fountain. These would be valuable additions as would be the bicycle storage, fitness equipment and change rooms that the master plan notes may be installed, subject to market demand.

# Moorabbin Airport Preliminary Draft Master Plan 2021

<b>Ground transport plan</b>	<ul style="list-style-type: none"> <li>○ Section 9.3.2 (Future Mode Shares): The SRL (east) alignment has been determined with the six stations to be developed having been declared.</li> <li>○ Figure 9.8 and 9.12.1: DoT requests MAC notes that once completed the Mordialloc Freeway will replace Springvale Road on the PFN (p180/186).</li> <li>○ Section 9.8.2 (Future Public Transport): Text reads: "Moorabbin Airport will work with the Victorian Department of Transport to obtain a direct bus service onto and through the Airport that will support Moorabbin Airport's continued growth..." DoT requests MAC work with DoT to investigate opportunities for potential bus service improvements that align the airport's future growth and provide a direct connection to the SRL station at Cheltenham in order to achieve an integrated public transport network.</li> <li>○ Section 9.9.2 (Future Cycling Network): DOT requests MAC note that Centre Dandenong Road and Lower Dandenong Road are designated as C2 Strategic Cycling Corridors. The Mordialloc Freeway is designated as a C1 Strategic Cycling Corridor (p184).</li> <li>○ Section 9.10.2 (Future Pedestrian Network): There is opportunity for DoT, MAC and Kingston City Council to work together to improve pedestrian infrastructure and connectivity within and around the Moorabbin Airport site (p185).</li> <li>○ Section 9.12.1 (Ground Transport Objectives – Public Transport): DOT requests MAC notes both Centre Dandenong Road and Lower Dandenong Road are classified as B4 (lower frequency 2-3 buses/hr) bus routes (p187). There is opportunity for DOT and MAC to investigate opportunities for improved bus services between Moorabbin Airport and key interchanges.</li> <li>○ Section 9.12.1 (Ground Transport Objectives – Active Transport): The text reads "including through implementation of the Kingston Cycling Strategy and the PBN". DOT requests MAC notes this is not the PBN – but future designated Strategic Cycling Corridors along Centre Dandenong Rd and Lower Dandenong Rd (p188).</li> <li>○ The text reads "advocate to update the Victorian Department of Transport's Movement and Place cycling classification to encourage north – south cycling links ". The Mordialloc Freeway is designated as a Strategic Cycling Corridor which runs north south (p188). DOT strategic Cycling Corridors (SCC) were reviewed and updated in 2020 and defined as key cycling routes for commuter trips and important destinations. There is opportunity for coordination between DoT and MAC in relation to cycling infrastructure to improve wider network connectivity.</li> <li>○ Section 9.13 (Future Ground Transport) &amp; 9.13.1 (Effect on Proposed Developments on Traffic Flows): It is requested MAC work with DoT regarding any further traffic impacts associated with proposed development of Moorabbin Airport to existing signalised intersections in the surrounding network will need to be assessed (p189 – refer to Section 9.12).</li> <li>○</li> </ul>	
<b>Chapter 10: Infrastructure Services</b>	<b>Climate change and risk</b>	<ul style="list-style-type: none"> <li>○ Suggest further discussion on the question of 'who is responsible for risk mitigation?' in terms of climate change and disclosure of risk particularly regarding climate change and asset management (Chapter 10).</li> <li>○ Suggest adding climate change to discussion regarding risk.</li> </ul>

# Moorabbin Airport Preliminary Draft Master Plan 2021

<p><b>Chapter 11:</b> <i>Airport Environment Strategy</i></p>	<p><b>Climate change</b></p>	<ul style="list-style-type: none"> <li>○ Suggest Environmental Action Plans and Environment Management System incorporates greenhouse gas reductions and climate change impacts, where possible .</li> </ul>
<p><b>Chapter 12:</b> <i>Airport Safeguarding Strategy</i></p>	<p><b>Safeguarding, NASF and N-contours</b></p>	<ul style="list-style-type: none"> <li>○ Although section 12.8 of the preliminary draft master plan discusses protected airspace, NASF Guideline F is not referenced in relation to on airport development. For example, section 12.3.2 discusses the ANEF system and provides a direct reference to addressing NASF Guideline A.</li> <li>○ The State recommends that section 12.8 of the preliminary draft master plan be altered to include direct reference to NASF Guideline F.</li> <li>○ Section 12.3.3 of the preliminary draft master plan states that MAC has prepared a set of N-contours, as per the recommendation of NASF Guideline A. The master plan clearly identifies the N-contours relating to daytime aircraft events, but there is no analysis of night-time aircraft events.</li> <li>○ The State notes that Moorabbin Airport is not listed on the federal Department of Infrastructure, Transport, Regional Development and Communication's website as having a curfew.</li> <li>○ Moorabbin Airport's Fly Friendly program identifies the limited training hours used by the flight training schools and aims to decrease the noise impact on airport neighbours by limiting the flying hours to daylight hours. The Fly Friendly program also states that "Moorabbin Airport operates 24 hours a day. Non-training aircraft departing or returning to the airport are not subject to these training limits and may still need to fly around a circuit to land safely."</li> <li>○ The concept of N-contours was introduced through NASF as an additional metric to assist airport operators communicate aircraft noise impacts on communities within airport environs. The State therefore recommends the master plan include an N-contour analysis of the flight events at night.</li> <li>○ The State also recommends that higher resolution images are used to display the N-contour aerial images, as the current aerial images appear grainy and difficult to read.</li> </ul>

# Moorabbin Airport Preliminary Draft Master Plan 2021

**Victorian Government departments and agencies consulted:**

- Department of Transport
- Department of Jobs, Precincts and Regions
- Invest Victoria
- Department of Health
- Victorian Planning Authority
- Environment Protection Authority
- Department of Environment, Land, Water and Planning (Planning; Climate Change; Port Phillip Region; and Water and Catchments).



City of  
**KINGSTON**

27 October 2021

Mr Paul Ferguson  
Chief Executive Officer  
Moorabbin Airport Corporation  
66 Bundoora Parade  
MOORABBIN AIRPORT VIC 3194

Dear Paul

**Re: Addendum to the City of Kingston's Submission to Preliminary Draft Moorabbin Airport Master Plan 2021**

With submissions extended by the Minister for Infrastructure, Transport and Regional Development, the Hon Barnaby Joyce, Council wishes to make an addendum to its submission endorsed on 28 June 2021.

In accordance with the Airports Act 1996, significant obligations exist on the Airport Lessee Company (ALC) to demonstrate through its submission to the Minister that the company has had due regard to those comments it has received in preparing the draft plan. Council is aware that substantive feedback has been provided by a range of parties with respect to the preliminary draft Moorabbin Airport Master Plan 2021. At the end of this submission, I have identified the questions that have arisen for Council and attached those from the Moorabbin Airport Chamber of Commerce and Industry (MACCI) that I agreed to outline following our meeting on 7<sup>th</sup> October, 2021 with the MACCI.

As Moorabbin Airport Corporation (MAC) will be aware, section 70 and 71 of the Airports Act 1996, sets out the purpose and contents of a master plan. The following matters put forward by Council in its original submission are of particular relevance and include:

1. Insufficient land being set aside for the Airport's core aviation role, and the extent to which non-aviation uses are being prioritised over aviation and aviation support services.
2. The threat that unconstrained retail, industrial and commercial development on the Airport land poses for Activity Centres across Kingston.
3. The location of proposed industrial and warehouse buildings along sensitive interfaces, and the lack of any urban design guidance or performance measures to manage the amenity impact on adjoining residents.
4. The loss of green open spaces and the extent to which this exacerbates existing urban heat island issues associated with the airport.
5. Airport safety, noise and the extent of development proposed (and already developed) immediately adjacent to existing runways.
6. The suggestion that the Moorabbin Airport could be appropriately located within the Urban Growth Boundary and the extent to which this proposal contradicts State Planning Policy.

Council seeks a substantive response from the MAC in terms of its serious concerns with regards to the above.

This addendum to its original submission builds upon the above points with particular reference to the following:

1. The location of rotary (helicopters).
2. Amenity / Siting of proposed non-aviation factories alongside the airport's well established existing residential interface.
3. The need to contemplate the requirement for a Major development Plan (MdP) to be triggered for works proximate to residential properties.
4. Noise issues raised by Dingley Village residents.

### **Rotary location**

Council is extremely disappointed to see through recent aerial photos and discussions with the MAC, the locations of helicopters in the southern precinct. During discussions with Council in 2019-2020, it was stated by the MAC that they would be relocating all helicopters from the southern end of the Airport (which is the area of the airport which is most exposed to the existing residential community) to a location further away from the residential interfaces at the airport.

Due to the loss of prime airside land caused by the extent of non-aviation development, one of the many flow-on effects evident is the lack of space now provided on the airport site for the effective strategic positioning of aviation uses. Thus, the designation and desire by the MAC for potential consolidation of the rotary precinct to the southern side of the airport, adjacent to the residential area. The impact that this will have upon the surrounding community's amenity has yet to be clearly explained to any stakeholder, residents, or Council. Concern has been reflected through ongoing submissions and discussions with the MAC that airport activities should be sited as far as possible from the residential interfaces of the airport to the south and west.

### **Amenity**

Of great concern to Council and residents, are the proposed locations for further non-aviation development, particularly across the western precincts of the airport. In Council's June submission, this was discussed at length with regards to the removal of irreplaceable aviation land. What this addendum wishes to address and strongly reiterate, are our concerns with the proposed location of non-aviation development to the north of Dallas Street and Houston Street, and east of Allandale Road, Mentone. The lack of consultation and detail provided to all stakeholders, but particularly existing residents, with what the MAC are intending to construct there, is extremely concerning.

As per section 71 (2) (gb) of the Airports Act 1996, MAC are required to... *'in relation to the initial period of the master plan-[provide] detailed information on the proposed developments in the master plan that are to be used for:*

- (i) *commercial, community, office or retail purposes; or*
- (ii) *for any other purpose that is not related to airport services; and*

*71(2) (gc) in relation to the initial period (see subsection (3A)) of the master plan—the likely effect of the proposed developments in the master plan on:*

- (i) *employment levels at the airport; and*
- (ii) *the local and regional economy and community, including an analysis of how the proposed developments fit within the planning schemes for commercial and retail development in the area that is adjacent to the airport; and (emphasis added)*

No substantive details are contained within the draft masterplan, other than that the area 3 (specifically area 3 that is circled below in Figure 1) is nominated for non-aviation purposes.

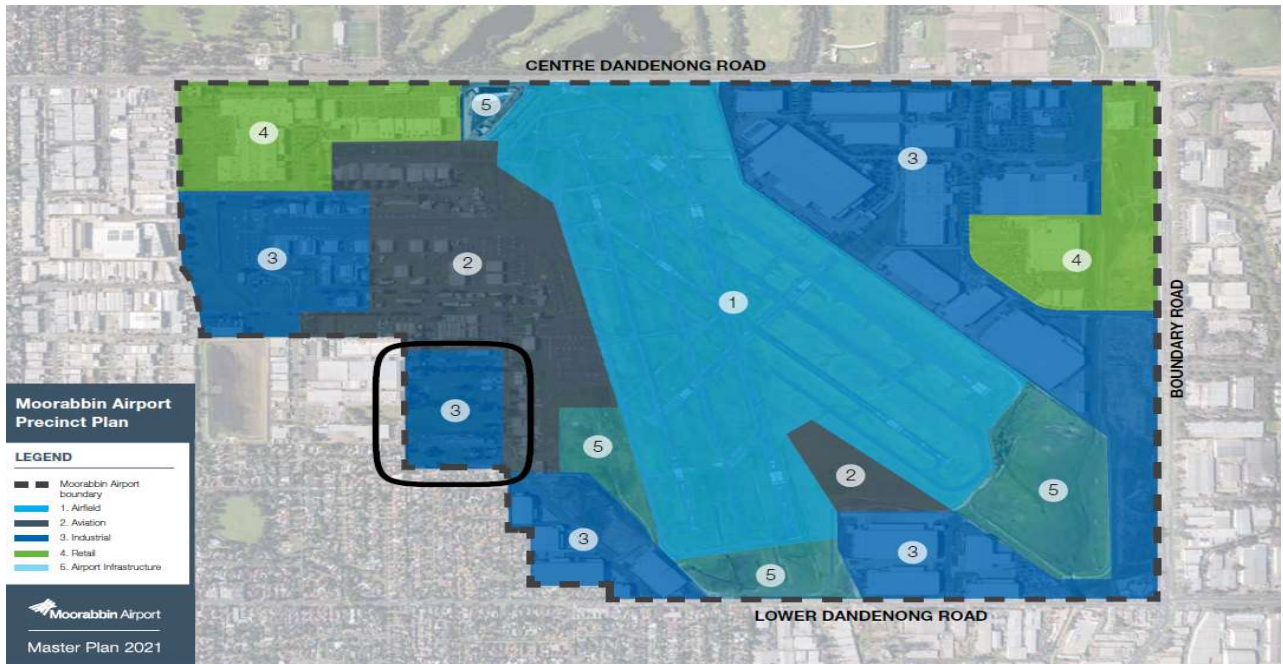


Figure 1: Area 3 (circled) proposed to be developed for non-aviation uses adjacent to existing residential community

The Airports Act 1996 is very deliberate in its intent through Section 79 to explicitly notify both State and Local authorities with responsibility for ‘town planning’. It is then clear at Section 81 that the Minister, in deciding whether to approve the plan, must have regard to several matters, including the use of the land within the airport and in surrounding areas.

With specific respect to ‘town planning’, Council have attended meetings with representatives from the MAC who assure Council that the factories already on site, including the McCormick’s building (which was discussed in the original submission - refer to Figure 2), located in the south west corner, directly adjacent to the existing residential area, are in fact compliant with Rescode and the Victorian Planning Provisions. It has been stated that this factory will be replicated again behind the existing residential area north of Dallas Street. Council strongly disagrees with the assessment that, in using the McCormick’s building (as illustrated below in Figure 3), that it complies.



Figure 2: Lower Dandenong Road looking north to the McCormick’s building



Rescode is not a standard used in the Victorian Planning Provisions for the industrial siting of buildings immediately adjacent an established residential area. In fact, in an Industrial Zone a 30-metre setback would generally be triggered from an established Residential Zone otherwise a Planning Permit would likely be required. Considerations in relation to any setback reduction under 30 metres would include detailed engagement with adjacent property owners on issues including:

- Overshadowing
- Acoustic controls
- Visual Bulk
- Detail of buildings finishes
- Window locations
- Articulation of walls
- Trees and landscaping to provide further articulation and amenity

The justification put forward by the MAC within the draft Masterplan to try to explain the extent of non-aviation development in such locations, is at best limited and at worst disingenuous to those that reside immediately next to the land designated for an airport. It further does not negate the fact that residential amenity has not been considered.

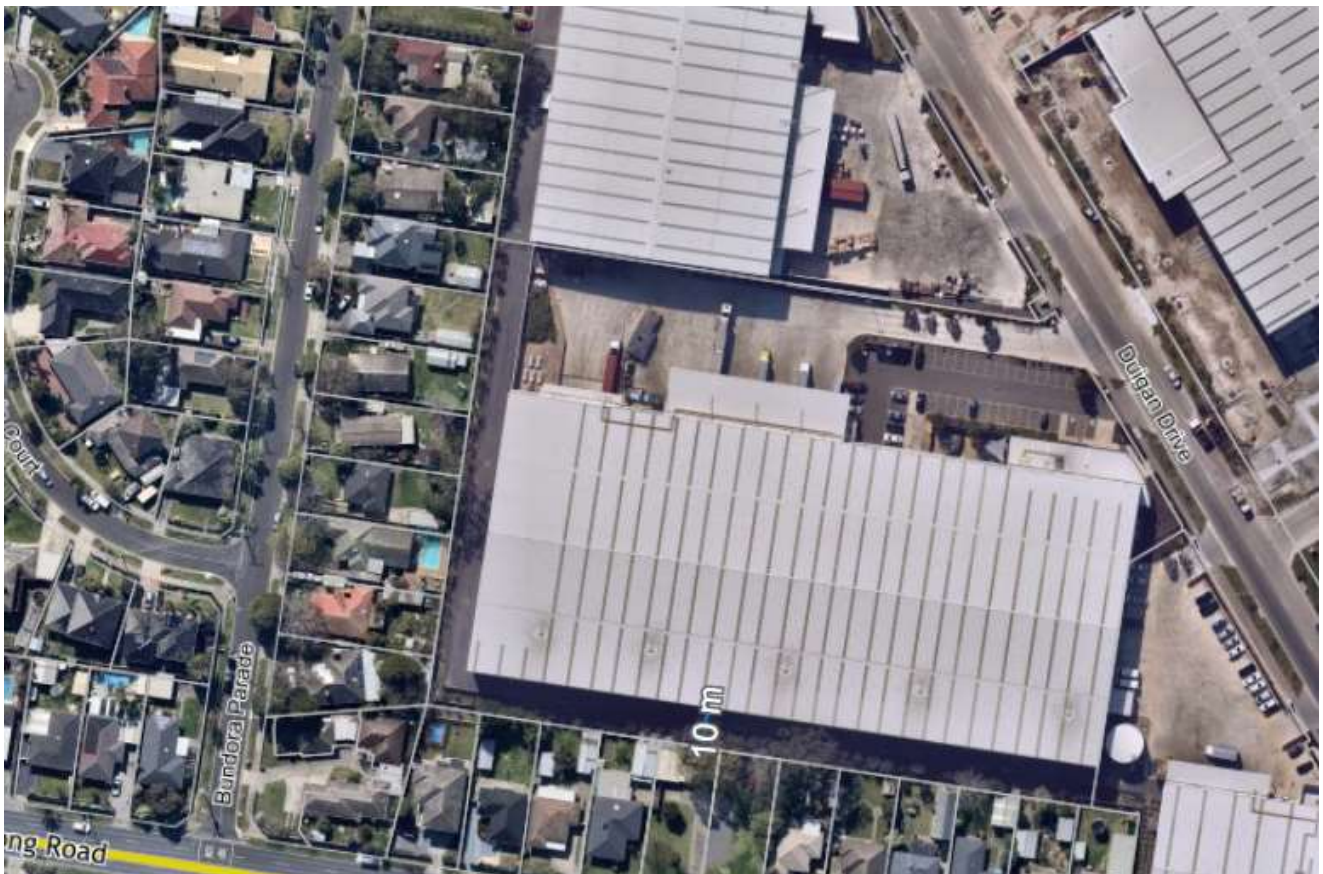


Figure 3: Aerial photograph of the McCormick's building with approximate setbacks to residential boundary

## Draft Major Development Plan

As you will be aware, major development plans are addressed in Division 4 of Part 5 of the Airports Act 1996. Under s89(1)(e) and (na), a major airport development is, *'a development that is carried out [on] an airport and that consists of...constructing a new building, where...the building is not wholly or principally for use as a passenger terminal, and the cost of construction exceeds \$20 million...or a development of a kind that is likely to have a significant impact on the local or regional community'* (emphasis added).

Given that the type of outcome shown on the previous page is so incongruous with any example of orderly and proper 'town planning' in 2021, a draft major development plan process would be a mechanism to ensure that those affected are appropriately consulted and a detailed and meaningful assessment on an outcome which has a *'significant impact on the local community'* is robustly scrutinised.

## Noise Complaints from Dingley Residents

Council have continued to receive feedback on noise complaints, particularly from residents in the Dingley Village precinct. Some residents feel that through the life of the existing Masterplan, responses to complaints are not treated seriously. Residents feel that any noncompliance with the fly friendly program, is ignored or not sufficiently actively pursued. Council consider that additional work should be done to provide for a more robust process whereby the resident registering the complaint is not only able to see that the complaint has been logged, but also provided with substantive advice that the relevant entity responsible for a breach in the fly friendly protocols is formally followed up.

## Meeting with Moorabbin Airport Chamber of Commerce and Industry

Council wishes to acknowledge the efforts of the MAC in co-ordinating a meeting with representatives of the Moorabbin Airport Chamber of Commerce and Industry (MACCI). It was agreed at the meeting that Council would identify, with the MACCI, a series of questions it wished to be followed up, noting some relate to Council raised items and others are of greater importance to the MACCI. It was requested that responses to the matters raised, would be provided to the Council and the MACCI prior to the Airport Lessee Company (ALC) submitting its preliminary draft masterplan to the Minister, so Council and the MACCI are sufficiently confident that the ALC has had due regard to the questions in considering its submission to the Commonwealth Minister.

The questions collated by Council have been themed as follows:

- Use of Commonwealth Land
- Aviation Noise (Helicopters)
- Residential Interface

## Use of Commonwealth Land

A range of objectives exist under Section 3 of the Commonwealth Airports Act including:

- a) to promote the sound development of civil aviation in Australia;
- b) to establish a system for the regulation of airports that has due regard to the interests of airport users and the general community; and
- c) to promote the efficient and economic development and operation of airports.

The Victorian Planning Policy Framework also states as a strategy to 'Recognise Moorabbin Airport as an important regional and state aviation asset by supporting its continued use as a general aviation airport, ensuring future development at the site encourages uses that support and enhance the state's aviation industry and supporting opportunities to extend activities at the airport that improve access to regional Victoria'.

**Questions:**

1. What is the extent of the airport land allocated for committed aviation purposes under the current masterplan? What is the extent of the reduction proposed under the preliminary draft masterplan?
2. On the basis a reduction in land for aviation is proposed, what basis exists to reduce the amount of land identified in previous master plans?
3. What studies have been completed that effectively demonstrate that for the life of the ALC's approved tenure of the Commonwealth Land, it has sufficiently planned for all anticipated aviation uses and aviation safety requirements at the Airport to warrant any reduction?
4. If the preliminary masterplan were to proceed as exhibited, and further loss of aviation land were to occur between Second Avenue and Northern Avenue, what land is remaining that could be safely and functionally made available for aviation on the balance of the airport (fixed wing and/or rotary), if it were required during the extended lease period provided to the ALC?
5. Can you please outline the consequence of downgrading a runway classification, in relation to what it has the effect of excluding, with respect to the airport's aviation role in the future?

**Aviation Noise (Helicopters)**

Concern has been reflected through ongoing submissions and discussions with the MAC that airport activities should be sited as far as possible from the residential interfaces of the airport to the south and west.

Given this ongoing request:

1. Can you please clearly outline the original location(s) of all non-emergency helicopter arrivals and departure landing points and storage areas at the Moorabbin Airport at the establishment of the lease of the land with the Commonwealth, when compared with the envisaged location(s) of helicopter arrival and departure landing points and storage areas in the current preliminary draft masterplan?
2. Is it correct that more of the helicopter approaches are proposed to be moved closer to residential properties to the south and west of the airport which would appear to contradict previous discussions between the MAC and Council regarding a desire to locate helicopter movements further away from existing residential areas?
3. Can you please provide information which illustrates whether the MAC is able to demonstrate that the intended future consolidation and siting of the helicopter arrival and departure locations, as envisaged in the preliminary draft master plan, will cause more or less noise for residents to the south and west of the airport from these activities?

**Residential Interface**

Concerns have consistently been communicated to the MAC regarding the siting and design of non-aviation industrial development adjacent to established residential areas on Commonwealth land. Can the MAC indicate:

1. The minimum setback distance any buildings will be located from the Dallas and Houston Streets and the Allandale Road residential interface to the Airport?
2. The maximum building height of any buildings which are planned to be located adjacent to the Dallas and Houston Streets and Allandale Road interface with the Airport?

3. What buffers are proposed to be prescribed between the well-established residential areas in Dallas and Houston Streets and Allandale Road interface with the Airport, and what form will these buffers take?
4. What information has MAC provided residents of Dallas and Houston Street and Allandale Road of its intentions with respect to development adjacent to their property boundaries?

### **Moorabbin Airport Chamber of Commerce and Industry questions**

The MACCI have provided Council with the following questions that have asked that I forward also requesting a written response too:

1. *As a result of all submissions, it appears MAC are now putting more emphasis on solutions for Aviation. However, every operator appears to need more space than before, both as Hangars and leased/parking areas. So how can this happen as so much "good" area has been lost already to Non-Aviation development?*
2. *MAC appear to be offering multiple solutions to operators but the question is how does this get resolved. The solutions are all dependent on other operators answers and so somehow decisions need to be made. How will this be brought to a conclusion? A drawing showing all the proposed development for hangars, access, aircraft parking, vehicle parking, timing etc will assist in answering this question. The ADP needs to be circulated.*
3. *Is MAC going to submit in writing answers to all the individual submissions?*
4. *Is MAC going to have a public consultation prior to the next step of it going to the Minister for approval?*
5. *The airport is located in a critical area S/East of Melbourne. This area is expanding rapidly and hence so should the airport. MAC state that the airport is primarily for training and other larger charter aircraft should use other airports. What would happen if Flight Training diminishes due to Covid? MB should provide a service that has the best MRO's, FBO's for attracting newer charter/RPT aircraft and more private operators as well as trying to maintain flying training. This would not be high volume and surely could be handled in the circuit, and this would service the S/East with better charter/RPT and medical facilities. Assuming this can be accommodated it still requires MAC to improve and or at least maintain the runway coding that supports these slightly larger aircraft. Will that happen as at this stage they have reduced the coding to level 1?*
6. *Turbulence is still a major issue to not only small training aircraft but also helicopters and larger jets. MAC's answer is that the modelling says it is OK. Talk to the operators and find out their opinion as most have a serious issue. How can the turbulence issue be resolved?*
7. *It is stated in the Master Plan that Non-Aviation development will subsidise Aviation development- provide the evidence of that.*
8. *How does the MAC plan to control/regulate B Double trucks making left hand turns into Grange Rd from Lower Dandenong Rd given they have to turn from the right hand side of the road. The same applies when they make a left hand turn out of Grange Rd, totally disrupting surrounding traffic.*
9. *The 2021 plan calls for the "decommissioning" of nine established buildings, many owned by the tenant. What genuine plan does the MAC have to relocate these businesses into suitable premises. In the last grab, 2 of the decommissioned businesses left the airport forever, will the same occur to all or some of these businesses?*

We look forward to your consideration of this addendum submission and your substantive responses to the questions Council and the MACCI have provided above.

Yours sincerely

A handwritten signature in blue ink that reads "Steve Staikos". The signature is written in a cursive style with a large, sweeping initial "S".

**Cr Steve Staikos**  
MAYOR

Released under the Freedom of Information Act 1982 by the Department of Infrastructure, Transport, Regional Development, Communications and the Arts

**FOI**

**From:** s22(1)(a)(ii) @abf.gov.au>  
**Sent:** Wednesday, 2 March 2022 1:20 PM  
**To:** s22(1)(a)(ii)  
**Cc:** s22(1)(a)(ii); Ports Policy; s22(1)(a)(ii); s22(1)(a)(ii)  
**Subject:** RE: Update regarding the Moorabbin Airport draft 2021 Master Plan [SEC=OFFICIAL]

**OFFICIAL**

Hi s22(1)(a)(ii)

Thank you for consulting with the Department of Home Affairs (Home Affairs), Australian Border Force (ABF) and the Australian Federal Police (AFP) on the draft Master Plan (dMP) for Moorabbin Airport.

Home Affairs, ABF and AFP have no concerns with the dMP, however we note the following:

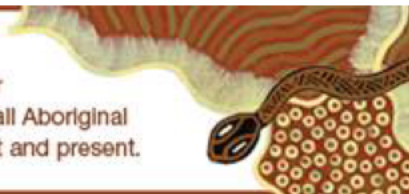
- The dMP does not appear to foreshadow the introduction of international services (passengers and cargo).
- Should Moorabbin Airport seek to introduce international services (passenger and/or cargo), or to establish an international airport terminal, this would need to be considered by Government under the Government's approval framework for the provision of border services at new and redeveloping ports, to determine whether a proposal is in the national interest, and to ensure that appropriate infrastructure, facilities and resourcing can be provided.

Regards,

s22(1)(a)(ii)

Assistant Director | Ports Policy  
 Traveller Policy & Industry Engagement | Industry & Border Systems Group  
 Australian Border Force  
 P: 02 s22(1)(a)(ii) | M: s22(1)(a)(ii)  
 E: s22(1)(a)(ii) @abf.gov.au

The Department of Home Affairs and the Australian Border Force acknowledges the Traditional Custodians throughout Australia and their continuing connection to land, sea and community. We pay respect to all Aboriginal and Torres Strait Islander peoples, their cultures and to their elders past and present.

**OFFICIAL**

s22(1)(a)(ii)

OFFICIAL



Airports and Environment

25 Constitution Ave  
Canberra ACT 2600www.airservicesaustralia.com  
ABN 59 698 720 886

8 March 2022

s22(1)(a)(ii)

Regulatory Officer  
Department of Infrastructure, Transport, Regional Development and Communications  
GPO Box 594  
Canberra, ACT 2601

Ref: *YMMB-MP-2021d*Dear s22(1)  
(a)(ii)

### **Moorabbin Airport draft Master Plan (dMP)**

I refer to your letter dated 7 February 2022 advising Airservices of the Moorabbin Airport final draft Master Plan (dMP). Our assessment of this dMP has not identified any significant issues for Airservices.

#### **Airspace Procedures**

All Airservices-designed procedures must be protected for future infrastructure developments. Airservices must be notified about any building developments (and the use of associated construction equipment), to ensure that they will not pose a hazard to aircraft operations and that all Airservices designed procedures are safe for aircraft operations. Visual Segment Surfaces (VSS) corresponding to approaches to the runways must be protected from building heights. The height of buildings or other developments must not penetrate the VSS.

Airservices must be notified of any changes that affect information on the published Departure and Approach Procedures (DAP) charts, such as the configurations of airport manoeuvring areas, taxiways and apron layouts.

#### **Noise and Environment**

The Moorabbin Airport Ultimate Capacity Australian Noise Exposure Forecast (ANEF) was endorsed for technical accuracy by Airservices on 6 April 2021. The dMP documentation has been updated to reflect this.

#### **Per-and poly-fluorinated alkyl substances (PFAS) Program**

In Section 11.4 (p209-210) – PFAS Management, it states that Moorabbin Airport are managing the elevated PFAS levels in conjunction with Airservices, the Commonwealth Government and the AEO. We would like to clarify that Airservices is not responsible for the PFAS contamination or the management of PFAS at Moorabbin Airport and we request that any mention of Airservices in Section 11.4 (209-210) is removed.

#### **Development Activity**

The proposed use of any plant or cranes required for the construction of any proposed developments associated with this dMP will require separate consultation between the airport, the proponent(s) and Airservices, prior to construction commencing, to ensure there are no impacts on Airservices facilities or operations.

OFFICIAL

If you require any additional information or wish to discuss any aspect of this letter further, please do not hesitate to contact my colleague s22(1)(a)(ii), on 03 s22(1)(a)(ii), or by email on [airport.developments@airservicesaustralia.com](mailto:airport.developments@airservicesaustralia.com).

Yours sincerely,

s22(1)(a)(ii)

s22(1)(a)(ii)

s22(1)(a)(ii)

Airport Development & Customer Engagement Advisor

Released under the Freedom of Information Act 1982 by the Department of Infrastructure, Transport, Regional Development, Communications and the Arts





**Australian Government**  
**Civil Aviation Safety Authority**

AIR NAVIGATION, AIRSPACE AND AERODROMES

*File Ref: F15/4269-1*

8 March 2022

Mr Phil McClure  
 Assistant Secretary, Airports Branch  
 Department of Infrastructure, Transport, Regional Development and  
 Communications  
 GPO Box 594  
 CANBERRA ACT 2601

Dear Mr McClure,

**Moorabbin Airport – 2022 draft Master Plan (dMP)**

I refer to your request seeking comment from CASA on the Moorabbin Airport dMP prepared by the operator, Moorabbin Airport Corporation (MAC).

CASA provided comment to DITRDC on the exposure draft Master Plan (edMP) on 5 February 2021. Following our discussions with DITRDC on 12 February 2022, MAC wrote to DITRDC and delivered a presentation on 28 February 2022 which was also attended by CASA.

**Aviation Development Plan**

CASA notes that MAC has estimated the capacity of the airport to be significantly lower than the corresponding figure in previous masterplans. The dMP indicates that one of the drivers for this reduction is CASA standards relating to the number of aircraft permitted in the circuit.

MAC may be referring to a 2009 Direction limiting the number of aircraft in the circuit which expired 12 years. CASA advises that there is no current regulatory restriction on the number of aircraft permitted in the circuit and considers the statement that 'airspace regulations reduce theoretical airspace capacity by 50% in circuits' to be inaccurate.

The dMP states that MAC proposes to change the runway code of the two principal runways from Code 3 to Code 2 (RWY 17L/35R) and from Code 2 to Code 1 (RWY 17R/35L).

CASA does not agree with the statement 'Code 3 aircraft cannot safely operate from Moorabbin Airport', as Code 3 aircraft could operate from Moorabbin at reduced operating weights.

CASA has considered the statements made in the MAC letter dated 28 February 2022 regarding the safe operation of Code C aircraft alongside small aircraft types. CASA advises that the Office of Airspace Regulation (OAR) monitors airspace risk and would seek to apply proportionate controls as required and notes Code C aircraft operations routinely coexist with smaller aircraft throughout Australia.

In summary, CASA advises there are no safety reasons to amend the runway coding as proposed and this issue is a policy matter for DITRDC to consider, noting the potential implications at other leased federal airports.

### **Safeguarding matters**

CASA notes the potential for significant expansions in non-aviation development.

In 2017, CASA worked with MAC regarding the potential for building induced wind effects to affect aircraft operations. The mitigation identified involved AIP entries regarding the existence of windshear and turbulence.

Additional non-aviation development in the vicinity of runways may require similar mitigations. CASA recommends that DITRDC should take the lead in obtaining a holistic understanding of potential safeguarding implications as the number of non-aviation developments increase.

CASA notes the proposal to amend prescribed airspace may facilitate additional developments in the vicinity of runways. Given the potential non-aviation development expansion plans, CASA suggests that further policy guidance on safeguarding implications of the changes to prescribed airspace may be beneficial.

Yours sincerely,

s22(1)(a)(ii)



Acting Branch Manager



**Australian Government**  
**Department of Agriculture,  
 Water and the Environment**

s22(1)(a)(ii)

Director  
 Vic/Tas Airports  
 Domestic Aviation and Reform Division  
 Department of Infrastructure, Transport, Regional Development and Communications  
 GPO Box 594  
 CANBERRA ACT 2601

Dear s22(1)(a)(ii)

### **Moorabbin Airport draft Master Plan 2021, Melbourne, Victoria**

Thank you for the invitation of 7 February 2022 to provide comment on the draft of the Moorabbin Airport Master Plan 2021 (dMP). Although it is not a statutory requirement, I appreciate that you have provided the Department of Agriculture, Water and the Environment with this opportunity to comment.

On 27 January 2021, the department responded to a request for comment on the Moorabbin Airport exposure draft Master Plan 2021. The department considered that the exposure draft Master Plan 2021 was broadly appropriate in its approach to management of per- and poly-fluoroalkyl substances (PFASs) and made a number of recommendations to improve the exposure draft Master Plan before provision of the dMP. The department notes that a number of these recommendations have not yet been addressed in the dMP, and advises that the Airport Lessee and the Department of Infrastructure, Transport, Regional Development and Communications may wish to consider those recommendations to improve the dMP.

The department also makes some additional recommendations below to further improve the dMP.

Section 6.4.6 of the dMP highlights the overlays that target a single issue or related set of issues to the development of Moorabbin Airport, however, no mention is made of an environmental or contamination overlay that would presumably be overlays highlighting issues worthy of consideration seeing that the dMP acknowledges the existence of PFAS at the Airport site in section 11.4. The department advises that the dMP would benefit from an environmental overlay that illustrates potential PFAS source areas within the airport boundary in section 6.4.6.

The department recommends that section 7.3.5 or section 11.12 include a commitment that any on-Airport fire suppression (including during systems commissioning, testing, and / or airport fire and rescue training) will not include the use of any PFAS containing products, and that all fire suppression products will be rigorously tested to confirm that no PFASs are present.

The department notes that section 10.3.1 states that the Moorabbin Airport drainage network collects road and surface runoff, as well as roof stormwater, and directs it to broader off-site

drainage networks owned by the City of Kingston and Melbourne Water Corporation. The dMP also states in section 11.10.1 that to reduce the potential for stormwater contamination, Moorabbin Airport undertakes a comprehensive monitoring program. The department recommends a commitment to ensure that any contaminated water above National water Quality Management Strategy (ANZWQGs 2018) and National Environment Management Plan 2.0 (HEPA 2020) (NEMP 2.0) relevant guideline values do not leave the site without appropriate treatment, especially given the elevated PFAS levels acknowledged in section 11.4 of the dMP.

The department notes that in section 11.4 of the dMP, Moorabbin Airport commits to conducting testing for elevated legacy PFAS and ensuring that [environmental] media are managed and remediated, including ensuring that PFAS levels do not pose a threat to human health. The department considers that the dMP should also include a commitment to manage PFAS and other contamination so that contamination does not pose a threat to the environment.

Attached general PFAS advice is intended to assist in future activities that may result in PFAS mobilisation (Attachment A).

The department anticipates that future Major Development Plans for Moorabbin Airport will be referred under section 160 of the *Environment Protection and Biodiversity Conservation Act 1999* for advice on potential environmental impacts.

If you have any questions, please don't hesitate to contact s22(1)(a)(ii) by phone on (02) s22(1)(a)(ii), or by email at s22(1)(a)(ii) @environment.gov.au

Yours sincerely

s22(1)(a)(ii)

s22(1)(a)(ii)

Director

Victoria and Tasmania Assessments Section

Environment Assessments (Vic, Tas) and Post Approvals Branch

8 March 2022

**Attachment A****Department of Agriculture, Water and the Environment (DAWE): General advice on per-and poly-fluoroalkyl substances (PFASs)**

The *National Environment Protection (Assessment of Site Contamination) Measure 1999* (ASC NEPM), enacted by the Parliaments of the Commonwealth of Australia and each of the states and territories and amended in May 2013, sets out a number of principles for site contamination, including preventing contamination, assessment, management and remediation. For example:

- contamination, or further contamination, of a site should be prevented;
- Investigation or Screening Levels should not be construed as desirable soil / water quality criteria or levels up to which contamination may be allowed to occur;
- there should be no noticeable or measurable change in the characteristics of soil, or associated ground or surface waters; and
- contaminated soil and associated ground and surface waters should be categorised by the nature and concentration of contaminants and subject to appropriate controls over their use, storage, transport and ultimate disposal.

The Department advises that companies should strive for nil environmental release of PFASs (particularly those of higher regulatory concern such as PFOS, PFHxA, and PFOA) to the environment, whether through use of foams that do not contain PFASs or through ensuring containment and treatment of expended foams.

Site owners, managers, and proponents that are undertaking activities in areas where PFAS chemicals are or may be present should ensure they have:

- an understanding of the extent and levels of PFAS contamination;
- an assessment of possible risks, and;
- if risks are identified, appropriate management and waste disposal strategies.

The steps generally follow the below approach:

- a proponent should identify if PFASs are known or likely to be present at the site. The *National Environment Protection (Assessment of Site Contamination) Measure 1999* (ASC NEPM)<sup>1</sup> outlines procedures for this, which should include a desktop historical review of past practices.
- if PFASs are known to be or likely to be present, a document outlining the proposed approach to managing PFAS should be developed prior to the commencement of construction or other works which have the potential to disturb areas of known or potential PFAS contamination.

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<sup>1</sup> For detailed guidance see: [Federal Register of Legislation](#) and [National Environment Protection \(Assessment of Site Contamination\) Measure | National Environment Protection Council \(nepc.gov.au\)](#).

- the document outlining PFAS management should be part of the CEMP and should include:
  - Identification of the extent and concentrations of possible contamination within the project footprint,
  - Identification of possible exposure pathways and ecological receptors including from stored material,
  - Identification of possible risks tailored to the identified concentrations, pathways and receptors, and
  - An outline of management strategies to be undertaken, as well as any remediation action plans or strategies, to manage any identified or potential risks.

### **Advice specific to Airport Lessees: Major Development Plans (MDPs) and Construction Environment Management Plans (CEMPs)**

More detailed steps are set out below.

1. A Tier 1 Preliminary Site Investigation that meets the requirements of the ASC NEPM should be conducted (see **Figure** ). This should, amongst other things, include a desktop historical review of past practices. Other more detailed site investigations (Tier 2) and assessments should, when required, be conducted in accordance with the requirements of Schedules A and B in the ASC NEPM.<sup>2</sup> A downloadable Field Checklist is also available from the Australian Government's NEPC website to assist proponents in reporting and quality assurance of PSI / DSI results.<sup>3</sup> A completed checklist should be provided with each PSI / DSI report.
2. As described in the PFAS NEMP and the ASC NEPM, the site investigations and assessments should be informed a robust Site Conceptual Model (CSM).<sup>4</sup> CSMs are to comprise a combination of topographic maps and site plans, hydro-geological cross-sections, photographs, topological network diagrams, and explanatory text, tables, or matrices as required. CSMs are iterative in nature and should be used to facilitate the assessment of hazards and risks, risk management, and remediation. They should depict the linkages between contaminant sources, exposure pathways, and on- and off-site receptors.
3. Site investigation and assessment processes should also be informed by nationally agreed guideline values and investigation or screening criteria:
  - a. investigation or screening criteria should have regard to the specific environmental values and characteristics of on- and off-site receptors identified in

<sup>2</sup> For detailed guidance see: [National Environment Protection \(Assessment of Site Contamination\) Measure | National Environment Protection Council \(nepc.gov.au\)](#).

<sup>3</sup> <http://www.nepc.gov.au/system/files/pages/9b067155-4726-423b-989b-5263263b9c16/files/nepm-field-checklist-draft-2010.xls>.

<sup>4</sup> See, for example, PFAS NEMP 2.0 (HEPA 2020: 18-49 and 80); ASC NEPM (Scheds B2 and B4, and Toolbox [www.nepc.gov.au/system/files/pages/622ffd38-f121-4daf-9ef3-ed7d40af68f2/files/nepm-errata-6feb2014-scheduleb.pdf]).

the CSM, drawing on relevant guidance.<sup>5</sup> The relevant Commonwealth and state regulators should be consulted to ensure that appropriately protective screening values have been selected. It is important to note that regulators may specify, or environmental legislation may prescribe, the level of protection required.

- b. Selection of these triggers for investigation should be based on a robust analysis of source-contaminant-pathway-receptor linkages and should be protective of the most sensitive receptors and environmental values on and off-site.<sup>6</sup>
4. If site investigations and assessments confirm the presence of PFASs, or if PFASs are likely to be encountered during construction or ongoing operations at the site, the MDP should commit to the development of a Construction Environmental Management Plan (CEMP) that contains a section or a separate document on PFAS management.
  5. The MDP should explicitly state that the CEMP will contain procedures that must be followed for assessing and managing contamination of soil and water by PFASs.
  6. The MDP should also state that the CEMP will be developed and implemented prior to the commencement of any horizontal or vertical construction or other works that have the potential to disturb areas of known or potential PFAS contamination.
  7. The PFAS management section in the CEMP should:
    - a. be consistent with *The National Water Quality Management Strategy*, including the *Australian and New Zealand Guidelines for Fresh and Marine Water Quality*,
    - b. be consistent with the *PFAS National Environmental Management Plan 2.0* (HEPA 2020), including its guideline values, as amended from time to time.
    - c. set out:
      - i. project scope and boundaries,
      - ii. roles and responsibilities,
      - iii. the site conceptual model – including maps and any monitoring data – identifying the extent and concentrations of possible contamination within the project footprint and nearby,
      - iv. possible exposure pathways and ecological receptors - both directly within the project area and also from the project area to any nearby receptors,
      - v. the site-specific risk assessment that identifies possible risks tailored to the reported or expected PFAS concentrations, exposure pathways, and potential receptors on and off the project area,

<sup>5</sup> ASC NEPM, PFAS NEMP 2.0, and other relevant guidance (eg, Australian sediment and water quality guidelines, as updated from time to time).

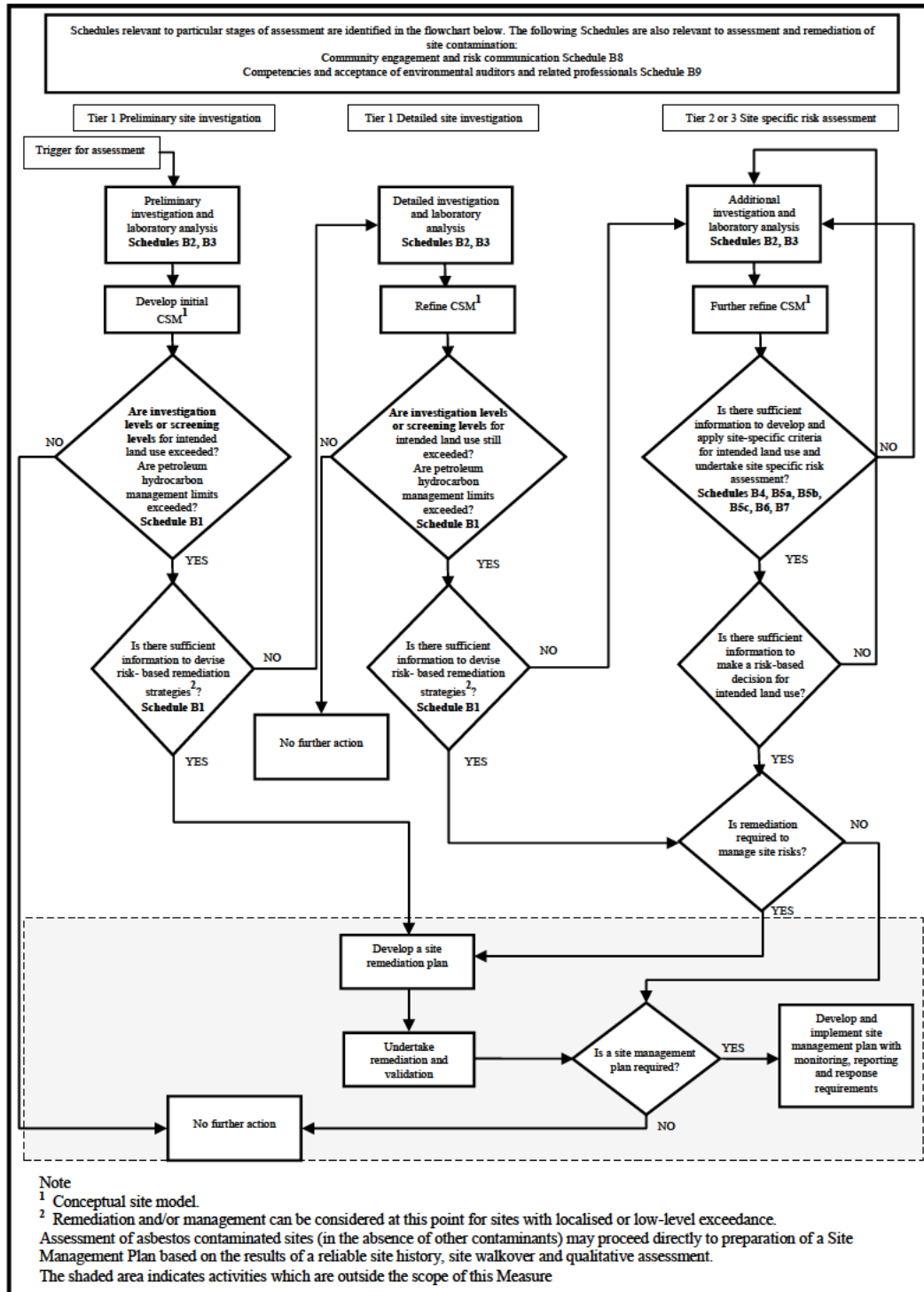
<sup>6</sup> For managing site-specific PFAS contamination, a site-specific conceptual site model (CSM) needs to consider source zones, specific contaminants, on and off-site transport mechanisms, relevant exposure pathways, potential receptors, and any relevant environmental values including indigenous cultural and spiritual values (HEPA 2020: 25; ASC NEPM 2013).

- vi. procedures for the management or remediation of PFAS contamination within the project area,
  - vii. strategies to reduce runoff and migration of contamination within and off the proposed project area,
  - viii. operational procedures for managing earthworks and the stockpiling or storage of contaminated water / soil / rock / concrete / tarmac / etc, including in relation to encapsulation, bunding, leachate control and disposal,
  - ix. if necessary, a contingency action plan for unexpected PFAS contaminant discoveries,
  - x. any one-off or ongoing soil, water, and / or biota monitoring requirements and testing procedures, and their relevant QA/QC procedures.<sup>7</sup>
- d. impose the following requirements:
- i. any PFAS contaminated material (including but not limited to excavated soil or sediment, leachate from soil or sediment, water arising from de-watering of soil or sediment, concrete, tarmac, appliances, pumps, pipes, hoses, fittings) must be handled appropriately and disposed of in an environmentally sound manner such that potential for the PFAS content to enter the environment is minimised; and
  - ii. any PFAS contaminated material with a PFOS, PFHxS or PFOA content above 50 parts per million (ppm) – that is, milligrams per kilogram or litre (mg/kg or L) – must be stored or disposed of in an environmentally sound manner that will achieve nil environmental release of their PFAS content.
- e. detail how materials at the concentrations listed at d (ii), if encountered, would be handled to achieve zero environmental release.
8. PFAS-related documentation, including any desktop historical review, Preliminary / Detailed Site Investigation, CEMP, or PFAS Management Plan should be published on a web site. Consideration should be given to auditing of these documents by a suitably qualified and experienced independent contaminated sites auditor.

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<sup>7</sup> Such as, US EPA Method 537.1, US EPA Method EPA-821-R-11-007; and US DoD and US DoE QSM 5.1 (2017). See HEPA (2020:89) for guidance.





**Figure 1:** Recommended general process for assessment of site contamination (Source: [Federal Register of Legislation](#), ASC NEPM 1999, registered 03 June 2013, Start Date 16 May 2013 (Volume 1, s 1-6, Sched A, page 14).<sup>8 9</sup>

<sup>8</sup> Note: For PFAS soil guideline values land use categories are not considered relevant for ecological risks, and therefore a single guideline value is now applicable to all land use scenarios (HEPA 2020).

<sup>9</sup> Note: Intended land use includes historical, current, and future land uses, both actual and potential, and requires consideration of on and off-site re-use of materials (including but not limited to soil, water, sediment, etc.).

**FOI**

**From:** s22(1)(a)(ii) @ABF.GOV.AU>  
**Sent:** Friday, 21 April 2023 9:08 AM  
**To:** s22(1)(a)(ii); s22(1)(a)(ii)  
**Cc:** s22(1)(a)(ii)  
**Subject:** RE: Moorabbin Airport fresh draft Master Plan [SEC=OFFICIAL]

**OFFICIAL**

Good morning

The ABF has the following feedback to provide:

Moorabbin is not currently referenced in the Notices of appointment under Section 15 and specification under Section 234AA of the Customs Act 1901 for Airports. As there are no indications that MAC plans to apply to service international flights or change the current situation regarding the storage of Customs-controlled goods, the ABF has nil issues.

Kind regards

s22(1)(a)

s22(1)(a)(ii)

Policy Officer | Ports Policy  
 Traveller Policy and Industry Engagement Branch  
 Industry and Border Systems  
 Australian Border Force

P: (03) s22(1)(a)(ii)

E: s22(1)(a)(ii) @abf.gov.au

**OFFICIAL**

s22(1)(a)(ii)



**Australian Government**  
**Civil Aviation Safety Authority**

AIR NAVIGATION, AIRSPACE AND AERODROMES

*File Ref: F15/4269-3*

27 April 2023

Mr Phil McClure  
 Assistant Secretary, Airports Branch  
 Department of Infrastructure, Transport, Regional Development,  
 Communications and the Arts  
 GPO Box 594  
 CANBERRA ACT 2601

Dear Mr McClure,

**Moorabbin Airport - draft Master Plan (dMP) document, March 2023**

I refer to your request dated 27 March 2023 seeking comment from CASA on the 2023 Moorabbin Airport dMP document prepared by the operator, Moorabbin Airport Corporation (MAC).

I am advised that the then Deputy Prime Minister refused to approve the 2022 dMP document on 29 March 2022.

The contents of the current dMP document as they relate to matters for which CASA has responsibility is substantially the same as that of the 2022 dMP document for which we provided comment in March 2022.

Accordingly, CASA's response has not changed and please refer to our letter dated 8 March 2022 which is attached for your convenience.

For any further information or advice, do not hesitate to contact Dilip Mathew on 02 s22(1)(a)(ii) or at s22(1)(a)(ii) [@casa.gov.au](mailto:s22(1)(a)(ii)@casa.gov.au).

Yours sincerely,

s22(1)(a)(ii)

Digitally signed by Adrian  
 Slootjes  
 Date: 2023.04.27 15:53:05  
 +10'00'

Adrian Slootjes  
 Branch Manager

OFFICIAL



25 Constitution Ave  
Canberra ACT 2600

[www.airservicesaustralia.com](http://www.airservicesaustralia.com)  
ABN 59 698 720 886

2 May 2023

s22(1)(a)(ii)

Team Member – Vic/Tas Airports and Economic Regulation | Domestic Aviation and Reform  
Department of Infrastructure, Transport, Regional Development, Communications and the Arts  
GPO Box 594  
Canberra, ACT 2601

Ref: *YMMB-MP-2021fd*

Dear s22(1)  
(a)(ii)

### **Moorabbin Airport fresh draft Master Plan (fdMP)**

I refer to your email dated 27 March 2023 advising Airservices of the Moorabbin Airport fresh draft Master Plan (fdMP). Our assessment of this fdMP has not identified any significant issues for Airservices.

#### **Airspace Procedures**

All Airservices-designed procedures must be protected for future infrastructure developments. Airservices must be notified about any building developments (and the use of associated construction equipment), to ensure that they will not pose a hazard to aircraft operations and that all Airservices designed procedures are safe for aircraft operations. Visual Segment Surfaces (VSS) corresponding to approaches to the runways must be protected from building heights. The height of buildings or other developments must not penetrate the VSS.

Airservices must be notified of any changes that affect information on the published Departure and Approach Procedures (DAP) charts, such as the configurations of airport manoeuvring areas, taxiways and apron layouts.

#### **Noise and Environment**

The Moorabbin Airport Ultimate Capacity Australian Noise Exposure Forecast (ANEF) was endorsed for technical accuracy by Airservices on 3 February 2023. The fdMP documentation has been updated to reflect this.

#### **Per-and poly-fluorinated alkyl substances (PFAS) Program**

As per our comments regarding PFAS - In Section 11.4 (p.212) – PFAS Management, it states that Moorabbin Airport are managing the elevated PFAS levels in conjunction with Airservices, the Commonwealth Government and the AEO. We would like to again clarify that Airservices is not responsible for the PFAS contamination or the management of PFAS at Moorabbin Airport and we request that any mention of Airservices in Section 11.4 (p.212) is removed.

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**Development Activity**

The proposed use of any plant or cranes required for the construction of any proposed developments associated with this dMP will require separate consultation between the airport, the proponent(s) and Airservices, prior to construction commencing, to ensure there are no impacts on Airservices facilities or operations.

If you require any additional information or wish to discuss any aspect of this letter further, please do not hesitate to contact me by email on [airport.developments@airservicesaustralia.com](mailto:airport.developments@airservicesaustralia.com).

Yours sincerely,

s22(1)(a)(ii) [redacted] s22(1)(a)(ii) [redacted]

s22(1)(a)(ii) [redacted]  
Airport developments & engagement advisor

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Australian Government  
 Department of Climate Change, Energy,  
 the Environment and Water

s22(1)(a)(ii)

Director  
 Victoria, Tasmania Airports and Economic Regulation  
 Airports Branch  
 Domestic Aviation and Reform Division  
 Department of Infrastructure, Transport, Regional Development,  
 Communications and the Arts  
 GPO Box 594  
 CANBERRA ACT 2601

Dear s22(1)(a)(ii)

### **Moorabbin Airport fresh draft Master Plan 2021, Melbourne, Victoria**

Thank you for the invitation of 17 March 2023 to provide comment on the fresh draft of the Moorabbin Airport Master Plan 2021 (dMP). Although it is not a statutory requirement, I appreciate that you have provided the Department of Climate Change, Energy, the Environment and Water with this opportunity to comment.

The department notes that the dMP states that flora and fauna values of the site are very low, consistent with the modified landscape and land use history, and that no species listed under Victorian legislation or the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) have previously been identified within the boundary of Moorabbin Airport. The dMP states that ecological surveys will be considered or undertaken where appropriate in new areas of development, and future plantings at the airport will be chosen from a Preferred Plant Register due to non-bird attracting features.

While the department considers this approach is suitable, the department notes that a number of matters protected under the EPBC Act have been identified as potentially occurring at or nearby Moorabbin Airport which should be considered in the context of the supplied aviation growth forecasts and non-aviation development plans. These include the Edithvale-Seafood Wetlands (Ramsar wetlands) which support a range of listed and threatened avifauna and internationally protected migratory birds, including but not limited to the Curlew Sandpiper (*Calidris ferruginea*), Australasian Bittern (*Botaurus poiciloptilus*), and an ecologically significant proportion of the population of the Sharp-tailed Sandpiper (*Calidris acuminata*).

The dMP states that 100 % of the lights on the airfield are now Light Emitting Diode (LED) lights. The department considers that the Airport Environment Strategy should address the potential for impacts due to light pollution, in particular use of lighting known to emit short wavelength blue light, to impact on wildlife including nocturnal and migratory avifauna. The department's *National Light*

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*Pollution Guidelines for Wildlife Including Marine Turtles, Seabirds and Migratory Shorebirds* (Commonwealth of Australia 2020) sets out best practice lighting design and steps involved in assessing potential impacts of artificial light on wildlife, and can be found at: <https://environment.gov.au/biodiversity/publications/national-light-pollutionguidelines-wildlife>

Attached general PFAS advice is intended to assist in future activities that may result in PFAS mobilisation (Attachment A).

The department anticipates that future Major Development Plans for Moorabbin Airport will be referred under section 160 of the *Environment Protection and Biodiversity Conservation Act 1999* for advice on potential environmental impacts.

If you have any questions, please don't hesitate to contact s22(1)(a)(ii) by phone on (02) s22(1)(a)(ii), or by email at s22(1)(a)(ii)@dcceew.gov.au

Yours sincerely  
s22(1)(a)(ii)

Acting Director  
Victoria Assessments Section  
Environment Assessments (Vic, Tas) and Post Approvals Branch  
09 May 2023

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**OFFICIAL****Attachment A****Department of Agriculture, Water and the Environment (DAWE): General advice on per-and poly-fluoroalkyl substances (PFASs)**

The *National Environment Protection (Assessment of Site Contamination) Measure 1999* (ASC NEPM), enacted by the Parliaments of the Commonwealth of Australia and each of the states and territories and amended in May 2013, sets out a number of principles for site contamination, including preventing contamination, assessment, management and remediation. For example:

- contamination, or further contamination, of a site should be prevented;
- Investigation or Screening Levels should not be construed as desirable soil / water quality criteria or levels up to which contamination may be allowed to occur;
- there should be no noticeable or measurable change in the characteristics of soil, or associated ground or surface waters; and
- contaminated soil and associated ground and surface waters should be categorised by the nature and concentration of contaminants and subject to appropriate controls over their use, storage, transport and ultimate disposal.

The Department advises that companies should strive for nil environmental release of PFASs (particularly those of higher regulatory concern such as PFOS, PFHxA, and PFOA) to the environment, whether through use of foams that do not contain PFASs or through ensuring containment and treatment of expended foams.

Site owners, managers, and proponents that are undertaking activities in areas where PFAS chemicals are or may be present should ensure they have:

- an understanding of the extent and levels of PFAS contamination;
- an assessment of possible risks, and;
- if risks are identified, appropriate management and waste disposal strategies.

The steps generally follow the below approach:

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- a proponent should identify if PFASs are known or likely to be present at the site. The *National Environment Protection (Assessment of Site Contamination) Measure 1999* (ASC NEPM)<sup>1</sup> outlines procedures for this, which should include a desktop historical review of past practices.
- if PFASs are known to be or likely to be present, a document outlining the proposed approach to managing PFAS should be developed prior to the commencement of construction or other works which have the potential to disturb areas of known or potential PFAS contamination.
- the document outlining PFAS management should be part of the CEMP and should include:
  - Identification of the extent and concentrations of possible contamination within the project footprint,
  - Identification of possible exposure pathways and ecological receptors including from stored material,
  - Identification of possible risks tailored to the identified concentrations, pathways and receptors, and
  - An outline of management strategies to be undertaken, as well as any remediation action plans or strategies, to manage any identified or potential risks.

#### **Advice specific to Airport Lessees: Major Development Plans (MDPs) and Construction Environment Management Plans (CEMPs)**

More detailed steps are set out below.

1. A Tier 1 Preliminary Site Investigation that meets the requirements of the ASC NEPM should be conducted (see **Figure 1**). This should, amongst other things, include a desktop historical review of past practices. Other more detailed site investigations (Tier 2) and assessments should, when required, be conducted in accordance with the requirements of Schedules A and B in the ASC NEPM.<sup>2</sup> A downloadable Field Checklist is also available from the Australian Government's NEPC website to assist proponents in reporting and quality assurance of PSI / DSI results.<sup>3</sup> A completed checklist should be provided with each PSI / DSI report.

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<sup>1</sup> For detailed guidance see: [Federal Register of Legislation](#) and [National Environment Protection \(Assessment of Site Contamination\) Measure | National Environment Protection Council \(nepc.gov.au\)](#).

<sup>2</sup> For detailed guidance see: [National Environment Protection \(Assessment of Site Contamination\) Measure | National Environment Protection Council \(nepc.gov.au\)](#).

<sup>3</sup> <http://www.nepc.gov.au/system/files/pages/9b067155-4726-423b-989b-5263263b9c16/files/nepm-field-checklist-draft-2010.xls>.

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2. As described in the PFAS NEMP and the ASC NEPM, the site investigations and assessments should be informed a robust Site Conceptual Model (CSM).<sup>4</sup> CSMs are to comprise a combination of topographic maps and site plans, hydro-geological cross-sections, photographs, topological network diagrams, and explanatory text, tables, or matrices as required. CSMs are iterative in nature and should be used to facilitate the assessment of hazards and risks, risk management, and remediation. They should depict the linkages between contaminant sources, exposure pathways, and on- and off-site receptors.
3. Site investigation and assessment processes should also be informed by nationally agreed guideline values and investigation or screening criteria:
- a. investigation or screening criteria should have regard to the specific environmental values and characteristics of on- and off-site receptors identified in the CSM, drawing on relevant guidance.<sup>5</sup> The relevant Commonwealth and state regulators should be consulted to ensure that appropriately protective screening values have been selected. It is important to note that regulators may specify, or environmental legislation may prescribe, the level of protection required.
  - b. Selection of these triggers for investigation should be based on a robust analysis of source-contaminant-pathway-receptor linkages and should be protective of the most sensitive receptors and environmental values on and off-site.<sup>6</sup>
4. If site investigations and assessments confirm the presence of PFASs, or if PFASs are likely to be encountered during construction or ongoing operations at the site, the MDP should commit to the development of a Construction Environmental Management Plan (CEMP) that contains a section or a separate document on PFAS management.
5. The MDP should explicitly state that the CEMP will contain procedures that must be followed for assessing and managing contamination of soil and water by PFASs.
6. The MDP should also state that the CEMP will be developed and implemented prior to the commencement of any horizontal or vertical construction or other works that have the potential to disturb areas of known or potential PFAS contamination.

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<sup>4</sup> See, for example, PFAS NEMP 2.0 (HEPA 2020: 18-49 and 80); ASC NEPM (Scheds B2 and B4, and Toolbox [[www.nepc.gov.au/system/files/pages/622ffd38-f121-4daf-9ef3-ed7d40af68f2/files/nepm-errata-6feb2014-scheduleb.pdf](http://www.nepc.gov.au/system/files/pages/622ffd38-f121-4daf-9ef3-ed7d40af68f2/files/nepm-errata-6feb2014-scheduleb.pdf)]).

<sup>5</sup> ASC NEPM, PFAS NEMP 2.0, and other relevant guidance (eg, Australian sediment and water quality guidelines, as updated from time to time).

<sup>6</sup> For managing site-specific PFAS contamination, a site-specific conceptual site model (CSM) needs to consider source zones, specific contaminants, on and off-site transport mechanisms, relevant exposure pathways, potential receptors, and any relevant environmental values including indigenous cultural and spiritual values (HEPA 2020: 25; ASC NEPM 2013).

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7. The PFAS management section in the CEMP should:
- a. be consistent with The *National Water Quality Management Strategy*, including the *Australian and New Zealand Guidelines for Fresh and Marine Water Quality*,
  - b. be consistent with the *PFAS National Environmental Management Plan 2.0* (HEPA 2020), including its guideline values, as amended from time to time.
  - c. set out:
    - i. project scope and boundaries,
    - ii. roles and responsibilities,
    - iii. the site conceptual model – including maps and any monitoring data – identifying the extent and concentrations of possible contamination within the project footprint and nearby,
    - iv. possible exposure pathways and ecological receptors - both directly within the project area and also from the project area to any nearby receptors,
    - v. the site-specific risk assessment that identifies possible risks tailored to the reported or expected PFAS concentrations, exposure pathways, and potential receptors on and off the project area,
    - vi. procedures for the management or remediation of PFAS contamination within the project area,
    - vii. strategies to reduce runoff and migration of contamination within and off the proposed project area,
    - viii. operational procedures for managing earthworks and the stockpiling or storage of contaminated water / soil / rock / concrete / tarmac / etc, including in relation to encapsulation, bunding, leachate control and disposal,
    - ix. if necessary, a contingency action plan for unexpected PFAS contaminant discoveries,
    - x. any one-off or ongoing soil, water, and / or biota monitoring requirements and testing procedures, and their relevant QA/QC procedures.<sup>7</sup>
  - d. impose the following requirements:

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<sup>7</sup> Such as, US EPA Method 537.1, US EPA Method EPA-821-R-11-007; and US DoD and US DoE QSM 5.1 (2017). See HEPA (2020:89) for guidance.

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- i. any PFAS contaminated material (including but not limited to excavated soil or sediment, leachate from soil or sediment, water arising from de-watering of soil or sediment, concrete, tarmac, appliances, pumps, pipes, hoses, fittings) must be handled appropriately and disposed of in an environmentally sound manner such that potential for the PFAS content to enter the environment is minimised; and
  - ii. any PFAS contaminated material with a PFOS, PFHxS or PFOA content above 50 parts per million (ppm) – that is, milligrams per kilogram or litre (mg/kg or L) – must be stored or disposed of in an environmentally sound manner that will achieve nil environmental release of their PFAS content.
- e. detail how materials at the concentrations listed at d (ii), if encountered, would be handled to achieve zero environmental release.
8. PFAS-related documentation, including any desktop historical review, Preliminary / Detailed Site Investigation, CEMP, or PFAS Management Plan should be published on a web site. Consideration should be given to auditing of these documents by a suitably qualified and experienced independent contaminated sites auditor.

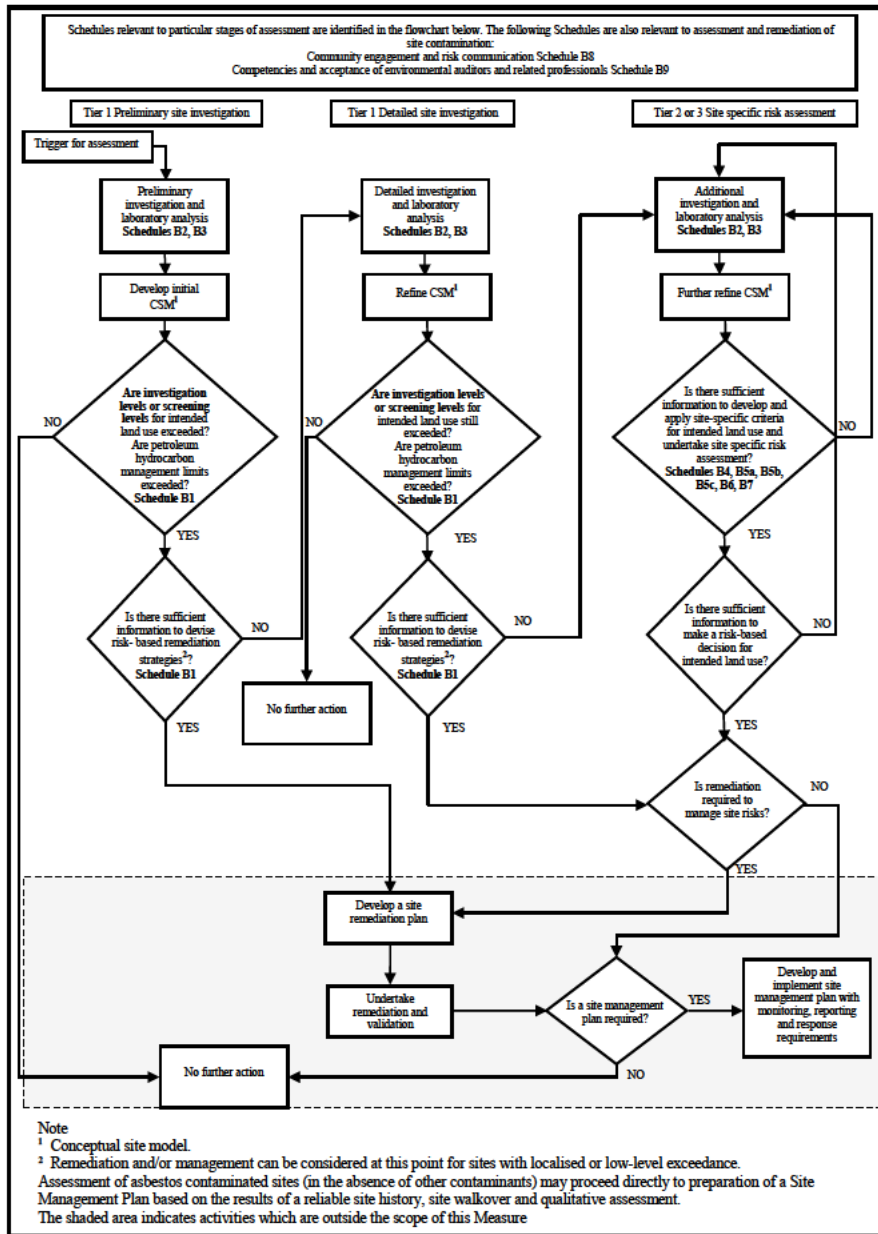


Figure 1: Recommended general process for assessment of site contamination (Source: [Federal Register of Legislation](#), ASC NEPM 1999, registered 03 June 2013, Start Date 16 May 2013 (Volume 1, s 1-6, Sched A, page 14)).<sup>8 9</sup>

<sup>8</sup> Note: For PFAS soil guideline values land use categories are not considered relevant for ecological risks, and therefore a single guideline value is now applicable to all land use scenarios (HEPA 2020).

<sup>9</sup> Note: Intended land use includes historical, current, and future land uses, both actual and potential, and requires consideration of on and off-site re-use of materials (including but not limited to soil, water, sediment, etc.).