

Moorabbin Airport is an asset under the ownership of the people of Australia.

It is controlled by the Commonwealth and it exists for the provision of air travel and airport operations of all types for the benefit of all Australians.

The Commonwealth entered into an operating lease agreement with Moorabbin Airport Corporation Pty Ltd (MAC) on 19/6/1998. Commonwealth ownership remains, as does the Commonwealth's ultimate control. The nature of the airport's use and its accessibility to all Australians is made clear in this lease, s3.

MAC is part of the Goodman Group (GOODMAN) – ASX: GMG

MAC (GOODMAN) on their [website](#) make the claim [sic]: '**Moorabbin Airport is owned + managed by Goodman**'

MAC's (GOODMAN) statement, claiming ownership, rather than stewardship, of a public asset, appears to inform all that has occurred since the commencement of the lease with respect to Moorabbin aviation operations and, it would seem, the thinking that underpins this proposed master plan. This public asset is being developed for the benefit of the few – that is, Goodman shareholders, to the cost of the people of Australia, who in effect own it and who should benefit from its availability and operations, and to the detriment of airport tenants and operators, both commercial and private.

## **AIRPORTS BILL 1996**

### **Second Reading**

Parliament of Australia, Hansard, Thursday, 23 May 1996 Page: 1305

Excerpts from the explanatory memorandum:

*The government recognises that airports are vitally important to the communities and regions which they serve. In circumstances where airport usage is increasing rapidly, passenger and freight users need airports which are operating efficiently, are responsive to user requirements and which deliver the services necessary to meet the requirements of the Australian tourism, export and service industries which depend on air transport to compete in world markets.*

#### **Government Airports Policy**

*The government's decision to establish long-term leasehold arrangements at federal airports will improve the efficiency of airport investment and operations in the interests of users and the general community. Leasing of the airports will facilitate innovative management and greater local involvement and input to decisions on their operation and development.*

#### **Aviation regulatory arrangements**

*With the advent of leasing, the government is also aware that significant market power will move from the public sector to the private sector. The government is thus committed to putting into place an appropriate regulatory framework to protect the interests of current and future airport users and local communities*

*At present, the Federal Airports Corporation operates as a self-regulating government authority in respect of land use, planning and building and on-airport pollution control. Post leasing, these responsibilities will need to be assumed by the government itself to ensure appropriate public interest regulation of the activities of airport lessees and other users*

#### **Pricing and quality of service**

*The government's aim is to ensure there is no abuse of the potential market power of airport operators. Our election commitment was to cap landing charges at the airports using a CPI-X system. The necessary prices oversight can be undertaken by the ACCC.*

### **Access for New Entrant Airlines**

*Provisions have been included in the bill on access for new entrants which will trigger the access provisions of the national competition policy reforms. Airport operators will have to satisfy the ACCC on how they intend to provide access for civil aviation operations, or be deemed a 'declared facility' for the purposes of these services. It is the government's intention to maximise the opportunity for commercial negotiation to solve access issues, but the ACCC may take an arbitration role if negotiation is unsuccessful. This approach will apply at the core regulated airports—that is, the major 12 FAC airports.*

### **Conclusion**

*The Airports Bill 1996 will form the central part of the regulatory oversight of the operations at Australia's major airports post leasing. The leasing of airports represents an important part of the government's transport reform program. The government's Airports Bill 1996 and companion Airports Transitional Bill 1996 will allow the leasing to proceed swiftly and with strong protection of the public interest.*

The Minister's assurances in the above statements, whilst being laudable, pragmatic and intended to underwrite the future operations of these airports, including Moorabbin airport, as well as their users, both commercial and private, and to assure the good operational future of these major and important items of public infrastructure, have not been established as practical, operational outcomes, at least at Moorabbin airport, for aviation operations and for commercial and private operators.

Lease holders at Moorabbin airport in private discussions all express the view that they are powerless in the face of the commercial strength of MAC (GOODMAN) and have no alternative but to accept leases and terms that are commercially unsatisfactory, something they are powerless to change and about which they are fearful of confronting due to the consequences of the actions visited on those who have done so.

Despite the well meant assurance about prices, that is, to: '*cap landing charges at the airports using a CPI-X system. The necessary prices oversight can be undertaken by the ACCC*' nothing of the sort has happened. On the contrary prices and charges for all operational aspects of the airport have risen far in excess of 'CPI-X' and to date with the ACCC having shown no interest. These high costs have driven many aircraft owners away from Moorabbin airport, a number of operators have transferred or established commercial operations off the airport and these imposts have resulted in the demise of a large number of the commercial operations that existed at the time of the establishment of the Commonwealth lease to MAC (GOODMAN), this as a consequence of the commercial issues with respect to tenant's leases and the severe increases in costs in combination with the movement of aircraft away from Moorabbin airport.

There is no provision in this master plan for New Entrant Airlines. On the contrary, this appears to be specifically ruled out, [master plan, section 7.3.8} regardless of any expectation regarding assurance to be given to the ACCC in this respect.

The conclusion in the explanatory memorandum, that is the assurance of '*strong protection of the public interest.*' has, regrettably, been very much honoured in the breach.

## **The Master Plan: Overarching issues:**

There is no commitment to develop new hangars and operations buildings, aircraft parking, taxiway and movement areas, ahead of the de-commissioning and removal of existing such infrastructure. This has been, and continues to be, an enormously destructive situation for all those trying to run businesses on this airport. This contrasts with the previous landlord, the Commonwealth Federal Airports Corporation, who were regarded as a model landlord.

Despite the statements made about the plans to accommodate more aircraft, hangars and operational infrastructure, the drawings offered in support of these statements do not appear to offer the room to accommodate what is claimed, unless much of the existing infrastructure is also removed, the layout re-planned, with new buildings constructed to suit.

The airport is at aircraft parking capacity and there is a severe lack of hangar space as things stand. The master plan does not make detailed provision of more parking and hangars to allow for such expansion, it merely states that more hangars are encompassed in the plan as is provision for parking, which is given in broad terms but not in the necessary specific detail. This is discussed in more detail below. A credible plan would offer a detailed process of planning and building in advance of requirements, or changes as proposed, but this master plan does not provide that.

There is nothing specific in this plan to accommodate private aircraft operators who in the past were a large and viable group at Moorabbin and who supported a large number of sales and maintenance businesses, almost all of whom have gone: both private operators and these businesses. '*Privately owned*' aircraft is mentioned only once in the master plan, 7.3.5 para 2, P 127, '*Private operators*' are also only referred to once in this plan, 7.3.9 para 2, P130. Aside from this their existence is ignored by MAC (GOODMAN) as are their interests.

Additional Regular Public Transport operations are ruled out – there is one such operator now and that is the limit according to this master plan. No new entrants will be accommodated. Nor will future freight operations be accommodated. This is a travesty for such a vital, and irreplaceable, part of public infrastructure in the southeast, close to the demographic centre, and close to major commercial centers, of a city of 5 million people.

The airport is being developed in such a way that only small aircraft categories will be accommodated in its operations. Larger aircraft as now used by emergency services [air ambulance, RFDS, etc.] and many other general aviation operations will not be accommodated – previously, whilst under Commonwealth control they were, and so they should be.

Safety has been degraded by the construction of large buildings close, we say far too close, to the runways, which regularly create a turbulence menace in certain weather conditions. This problem did not previously occur prior to the construction of these buildings. As Moorabbin has a large number of training flights, and therefore inexperienced pilots, and many small aircraft which because of their size are more affected by the impacts of turbulence, this development is regrettable.

This plan is therefore entirely detrimental to the future of all operators – commercial and private – at Moorabbin Airport and to the interests of the Australian citizens, its owners.

MAC [GOODMAN] have not in our view been good corporate citizens. Their treatment of tenants leaves a great deal to be desired. In putting their interests well ahead of their tenants MAC (GOODMAN) have, and continue, to imperil the future of those who have invested in commercial operations at Moorabbin Airport, in turn jeopardizing the employment and future of all those employed by these operations, and their families.

## **The Master Plan: Issues with various aspects of the plan**

It is perhaps instructive when considering this master plan and its effect on aviation at Moorabbin airport to commence at the end of the document:

### **14.1 Conclusion p 277**

*This Master Plan 2021 has been prepared to address the requirements of the Airports Act and establishes:*

- the strategic vision for efficient, sustainable and economic development at the Airport over the next 20 years, and sets out detailed development and land use plans for the next eight years;*
- the location and nature of land uses at the Airport that best balances the productive use of industrial and commercial land for job generation and economic activity for south-east metropolitan Melbourne, with the safeguarding principles and procedures that ensure Airport viability;*
- Moorabbin Airport's sustained commitment to, and respect for the surrounding community as seen through its continued involvement in numerous community outreach programs; and*
- a strategy to provide for continual improvement and engagement with key government and Airport stakeholders as well as the broader community in relation to environmental management at the Airport.*

MAC (GOODMAN) make no commitment or provide any undertaking for the continuance of aviation operations of all types as long established at Moorabbin airport. The focus of this master plan, plainly, as summed up in the conclusion, is singularly for the development of non-aviation commercial infrastructure without any apparent consideration for its impact on aviation or the future prosperity of aviation companies and flying operations, of all types, clubs, private and commercial, as have historically occurred at this airport.

### **Introduction 1 – p 9**

*Aviation movements will grow from 268,000 per year today to 375,000 at the end of the master planning period. Movements increased by 10% over the past five years.*

No evidence or statistical analysis is provided to support this assertion with respect to claimed movement growth. However, this claim is central to all that follows in the master plan.

Movement growth, as claimed, is unlikely to be supported by current numbers which on current trends will be further detrimentally impacted by the proposals in this master plans therefore bringing into question the veracity of many of the assertions in this master plan.

#### **1.1.1 – Overview – p 10**

*Consistent with prior Master Plans, land use in Master Plan 2021 is framed around aviation objectives and activities. Precincts are planned in response to safety, airspace, our flight training role and aviation infrastructure.*

This assertion demands detailed objective review. This broad assertion is not supported by evidence as to what, precisely, these 'aviation objectives' are, who provided input about them, statistics about the study of these objectives, how these studies were reviewed, when these details were made available for stake-holder comment, what feedback was received from stake-holders, and how the final position was arrived at in view of all of these matters.

### 1.1.2 – Objectives – p 12

#### *Sustainable planning and development*

*- investing a further \$300 million in aviation and non-aviation activities by 2029. \$500 million has been invested by Moorabbin Airport and its customers from privatisation to 2020; and –*

This broad-brush statement, lacking in detailed supporting evidence as to aviation-related expenditure, to be accepted requires detailed evidence in addition as what expenditure, if any, was made in excess of that required to be spent under the terms of the lease, or which was not expenditure that was part of a commercial lease agreement.

*–planning and delivering innovative aviation and non-aviation development programs that lead the way in design, customer amenity and sustainability. Non-aviation development continues to subsidise future investment in the Airport’s aviation activities, while generating further employment for the region;*

The claim that non-aviation development subsidises future investment of the Airport’s aviation activities demands close scrutiny. If this claimed future investment is more than the maintenance items specifically required of MAC (GOODMAN) by the terms of their lease, then specific details of what is planned and what benefits will accrue to aviation must be provided. Operational improvements for the runways and taxiways. long requested as a safety upgrade, have not been provided by MAC (GOODMAN) despite many years of successful non-aviation development that would, seemingly, if this claim is to be viewed as credible, have already provided a solid precedent in this regard, alas, it has not.

If the broad-brush overview in **7.4.2 Aviation Investment - Future – p 132** is intended to address this planning deficiency, then that fails through the lack of specific details.

#### **7.4.13 Aviation Investment -2015 to 2020 – p 143** states that:

*In excess of \$25 million dollars has been invested into airport infrastructure and facilities since the Master Plan 2015*

Further details are set out in **Figure 7.12 – p 143**. From this table claims of expenditure are:

- **Airport support facilities expenditure** - which appears to relate to buildings constructed for commercial leases.
- **Airport equipment and operations expenditure** – which appears to relate to equipment required by MAC (GOODMAN) to operate the airport under the terms of their lease.
- **Hangar expenditure** – which relates to ‘*Mix of airport and customer funded*’ – how much by MAC (GOODMAN) is not revealed and therefore the credibility of this claim by MAC (GOODMAN) on their own behalf is open to question.
- **Airside infrastructure expenditure** – which appears to be items required to be maintained by MAC (GOODMAN) under the terms of the lease.

As such, it is difficult to see clear evidence of aviation development from subsidised investment and no clear case is made in the master plan that this will change in the future.

Without detailed plans and supporting evidence the claim by MAC (GOODMAN) that non-aviation development subsidises future investment appears to be simply one of hope; as such it is also seemingly misleading.

Likewise, the further claim with respect to employment creation through investment that is specific to aviation activities requires further detailed explanation as it stands this claim’s vagueness renders it worthless for planning and assessment purposes.

### *Economics, community contribution and sustainability*

*- enhancing our community focus and volunteer culture by expanding the Australian National Aviation Museum site by 50% to 12,000 sqm*

From a review on Google maps the actual area of the museum site appears to be about 7000 sqm.

The recurring and seeming carelessness with stated facts calls into question the credibility of all stated facts and numbers in this document, and therefore the underlying credibility and reliability of this master plan.

#### **1.1.3 – Key Achievements since Master Plan 2015 - p 13**

*- modernised 30% of aviation facilities on leased sites. The largest facility developed was the four-hectare CAE project.*

From google maps – it appears that 1.2 Ha approximately of building, not including pre-existing parking allocated to CAE, was actually developed.

Modernisation on leased sites, aside from CAE, appears to have been very limited, possibly applying to 2 tenant sites in total.

Further explanation is therefore required from MAC (GOODMAN) about these master plan assertions.

#### **1.3 Aviation land - p 14**

*- 40 hectares of land for the aviation support precinct.*

*- is not a constraint for aviation activity at the Airport. Safety and airspace capacity restrictions remain the major constraint.*

*- is planned for existing and new aviation operators*

No case is made as to why this land area presents no *constraint for aviation activity*, as claimed. At present aviation faces serious impediments and constraints due to lack of space for operations and facilities; how a reduction would not further impede this requires detailed explanation.

Full planning details need to be provided to support the assertion that this allocated space provides for existing operators and, importantly, future aviation expansion, as must occur as the population rises and the demand for air operations of all types becomes greater and, accordingly, new operators seek to take up aviation operations.

#### **Aviation initiatives 1.3 - p 14**

*50% of flight training sites could be redeveloped to add a second storey or ground floor extension.*

No explanation or details as how this figure was arrived at, or could be achieved, are provided. Considering the present operations, airside requirements, non-airside requirements: access, vehicle parking etc., this statement appears to be in the category of wishful thinking. This claim requires a detailed assessment of requirements and an explanation as to how it would be implemented, and in particular how it would be implemented without affecting the on-going day-to-day operations of the flight training operations referred to.

#### **Aircraft Parking 1.3 - p 14**

*6 hectares (160,000 sqm) of aircraft parking is provided under Master Plan 2021. Whilst our design flight training aircraft requires 99 sqm, Moorabbin Airport standard parking provides 120 sqm; and– Master Plan 2021 plans up to 720 aircraft parking spaces. Today there are 320 aircraft based on airport and its forecast this will rise to 420 over Master Plan 2021*

Further details are provided in **7.3.9 Aircraft parking, hangars and hardstand – p 130**

The master plan does not provide the detailed information needed to enable assessment as to how the claimed parking for the number of aircraft will work, what access is available, what the situation is with respect to ease of access and how these sites are located and will function where parking and operations buildings need to be co-located or reasonably close to each other. Further specifics providing exact details are needed for the master plan if this is to be a credible master plan and not simply a plan presented in hope, given that one section specified for parking appears to be effectively inaccessible [see below re 7.3.9].

Where parking is visible in the plan it does not appear to be co-located with flying schools and commercial operators, which, surely, is a necessity.

There appears to be no provision for private aircraft parking.

**7.1 2 Summary - p 117** states that there are presently '425+' aircraft parking spaces, yet with the 320 aircraft stated in the master plan based at Moorabbin, parking options are limited or not available. It appears that the master plan assessment of parking is deficient and further explanation is required as to what the facts are.

Considering that aircraft parking areas are now highly congested with the existing 320 aircraft based at Moorabbin, detailed information must be provided to explain how the present parking issue will be remediated and how an additional 100 aircraft will be accommodated.

### **Hangars 1.3 - p 14**

*Master Plan 2021 plans for the greatest amount of hangar floorspace since privatisation,*

The master plan does not appear to detail the locations of these hangars. Vague descriptions such as 'Main apron', Northern Apron, are not sufficient for this critical aspect of the airport's future.

*[hangars] - are not required on a day-to-day basis for 92% of flight training aircraft. Rather the hangars at Moorabbin Airport are predominantly used for aircraft maintenance and rotary aircraft parking.*

Whilst the first sentence may be generally true, unless maintenance is required [which it often is], it is misleading as to the broader implications for airport operation and operators. Note that Moorabbin's biggest flying school operates a large hangar that is in constant, daily, use.

As things stand, there is a critical lack of hangar space for maintenance operators.

A number of privately owned aircraft were hangared but due to the recent removal of hangars they no longer have access to hangar space. For many other private owners, hangar space has been unobtainable due to the lack of provision.

### **1.4 Structure of Master Plan 2021 p 16**

#### **In this Master Plan 2021, para 3**

*- statistics, assumptions, forecasts and other quantitative data included in this Master Plan 2021 are based on estimates and are indicative only*

Therefore no data in this master plan can be relied on as being either factual or accurate. Despite this, MAC (GOODMAN) present data throughout the master plan as if it were factual and use this data to assert that their vision for the future of Moorabbin airport will be positive for aviation and aviation operators, and in the public interest, when, apparently, there is no hard, factual, or analytical data to support any major aspect of this master plan. This master plan, on the basis of MAC's (GOODMAN) statement above, is based on conjecture. Despite this MAC (GOODMAN) apparently expect the

Minister to approve this master plan on behalf of the Commonwealth and the citizens of Australia whose asset this airport is.

The Minister, in the explanatory memorandum to the Airports Bill provided the assurance to the Parliament and to the Commonwealth that:

*'The government's Airports Bill 1996 and companion Airports Transitional Bill 1996 will allow the leasing to proceed swiftly and with strong protection of the public interest.'*

A master plan that, by the admission of its author, lessee MAC (GOODMAN) is based on numbers that are not facts, that are '*estimates and are indicative only*' can not meet the planning standards required to deliver on the protection and assurance of the Federal Parliament of: '*strong protection of the public interest*'.

## **2.0 Economics & Employment - p 19**

*Moorabbin Airport has invested \$500 million into the Airport site including \$250 million in the last five years, and a further \$300 million will be invested over the next eight years.*

What, if anything, it must be asked, as to what has been spent on aviation development, other than that required for maintenance, under the specific terms of the lease and nothing else?

This requires a specific and detailed answer from the lease holder in order to provide the information required to make a balanced assessment of their claims and to assess their claims with respect to future development.

As this claim is central to all aspects of planning for future Moorabbin airport operations the provision of further details with supporting facts and statistics is essential to assess the credibility of this master plan. Failing this, the presently amorphous claim is meaningless and points to the alternative conclusion that the development referred to is non-aviation and therefore of no benefit to present or future Moorabbin airport aviation operations and development.

### **3.2.2 Existing initiatives p 36**

#### **Reduced Energy Consumption**

*- 40 solar panels currently operate on four buildings at the Airport, generating 350 kW and providing renewable electricity*

The reader may well assume on reading this that such improvement exists on buildings in operational areas, as encroachment of non-commercial leases into these areas is the principal subject matter of this master plan. This is not the case.

#### **Reducing Carbon Emissions and Climate Change**

*- the new Circuit Booking System has reduced waiting times on ground running, meaning there are shorter waiting times (with an average reduction of 20 minutes in peak periods) and reduced fuel consumption, saving 36,000L of aviation fuel per year; and*

The circuit booking system is not an initiative of MAC (GOODMAN), who have no control over it, despite this claim. Nevertheless, having made this claim as if it were their initiative no facts are provided to support their assertion that there is an average reduction of 20 minutes waiting time in peak periods, and an annual saving of 36000L of fuel. As such these claims must be regarded as conjecture and rejected until demonstrated with supporting facts.

*–the Circuit Booking System has also reduced speculative ground taxiing to run-up bays when airspace is not available and resulted in fewer aerial “go-arounds” thereby reducing fuel burn during final approach;*



This is again conjecture. All aircraft are equipped with radios and circuit requests could be made before taxiing, or by phone to Moorabbin tower.

*–redevelopment of the aviation precinct to improve access to the runway network has also reduced the fuel required for aircraft to taxi from hangars;*

No details given as to what this ‘redevelopment’ is. We are unaware of any development as claimed, let alone any consequential reduction in fuel use. This claim appears to be spurious.

*- charging points for electric vehicles have also been installed at the Airport in new developments*

As with the claim about solar panels, this claimed improvement again does not relate to the aviation operational area of this master plan.

### **3.3.2 Current Community Contribution p 42**

#### **Community Life**

*–supporting the food security charity FareShare by providing a 3,000 sqm kitchen garden at no cost at Moorabbin Airport. This land produces 20,000 tonnes of vegetables annually –*

The output claim appears to be an astonishing achievement, if true. Hopefully MAC (GOODMAN) has facts to support this claim which they will be willing to provide. Failing that, this seemingly unlikely claim would appear to be no more than a feel-good assertion designed paint this large corporation in the best of corporate light, despite the treatment meted out to many of their tenants. If a claim such as this cannot be supported with facts, then that should inform the view as to the worthiness of MAC (GOODMAN) and to what extent this master plan with its many claims, mostly unsupported with detailed facts and data, might be trusted by those who must make decisions with respect to its implementation.

### **4.3 Community & Stakeholder consultation process - p 51**

*Moorabbin Airport established a consultation program with a wide range of community and other stakeholder representatives. The following key stakeholders were consulted with during this process:*

*– Airport customers – including aviation users.*

This, by all accounts, is generally not the case, perhaps to selective groups that include some, but not the majority of airport users. It is difficult to find a tenant, operator, private aircraft owner, or aviator at Moorabbin who feels they have been consulted by MAC (GOODMAN) and for those very few who do acknowledge consultation, none appear to feel that it has been open, forthcoming, reliable or adequate.

MAC (GOODMAN)’s advised stakeholder consultation session was set for a date that left very little time for those present to consider and form a clear view about what may have been presented. In any event, the stakeholder consultation session was cancelled due to covid restrictions. Despite there being time remaining for this consultation to have been re-scheduled, it was not. Therefore this most complex master plan and process, the plan itself being a 328-page document, not easily read, not easy for the average person to comprehend, obfuscated by obscure planning comments and generally unsupported by evidence or detail has been left to the stakeholders themselves to try and comprehend, without any adequate form of assistance from MAC (GGODMAN). This does not seem or appear to be the action expected of a good corporate citizen with a genuine interest in stakeholder consultation.

A number of operators have faced eviction from their business premises with 6 months’ notice, non-negotiably. This has resulted in business hardship, in some cases with severe commercial repercussions, and by observation, seemingly, with consequential personal impact and pressure and mental health considerations as a result of this corporate action.

GOODMAN, on their corporate website, make a number of statements about their approach to business and tenants. Under the banner of 'Who we are, [About us+](#) [1]

*We don't believe in putting business before people.*

'Who we are [Our values+](#)':[2]

*We strongly believe in the concept of fairness – in creating value and in shared success. We believe in balancing the needs of our customers and investors with the needs of our company*

*We're inclusive and collaborative. We treat people with respect.*

Perhaps these ideals of service may apply to other GOODMAN tenants but based on the expressed experiences of MAC (GOODMAN) tenants at Moorabbin airport sadly these ideals do not appear to apply to them.

Leases from MAC (GOODMAN) contain and apply 6 month building demolition clauses that make financing and development by individual operators hard to justify, if finance under such lease terms can be obtained at all. Such an attitude towards tenants does not reflect well on the corporate behaviour of a large, publicly listed corporation whose behaviour ought to be exemplary. This commercial practice sits at odds with the former practices of the Federal Airports Corporation, prior to the leasing of the airport to MAC (GOODMAN), whose behaviour was, by all accounts, exemplary.

This master plan, whilst making many amorphous feel-good statements about consultation with persons who the master plan describes as customers, but who are real people, with real lives, real families, operating real businesses with real employees in turn with real families who are dependent on them; does not address, in any way, the process by which this master plan, which will certainly involve further disruptions to airports tenant's lives and businesses, will be progressed through its stages and whilst doing so how the people and businesses so affected will be consulted, supported and if necessary, compensated.

This master plan provides no assurance that an existing customer of MAC (GOODMAN) will, if affected by the proposed changes in this master plan, be able to continue, in future circumstances at least as good as those that exist for them at present, with costs, rents, fees and or other charges no greater than those that currently exist, albeit with allowances for normal or established rental and charges reviews.

The human aspect of this plan is of critical importance. The Australian Government, under the Department of Health, has implemented a Mental Health Commission with specific initiatives for mental health and suicide prevention.

This master plan does not address these serious issues when, clearly, the actions proposed in this plan will cause personal pressure on a great number of people whose livelihoods are dependent on their or their employer's commercial operations at Moorabbin airport.

In accordance with the Federal Governments mental health initiatives, this master plan must contain an assessment for the ramifications of the master plan's impact on the mental health of tenants. employees and other operators at Moorabbin airport, and the proposed assistance and support to be provided to those affected. Currently this issue is not addressed.

### **5.8.1 Aviation Planning Standards - p 7**

*At the Airport, the following aerodrome reference code groupings are those applicable to the expected operations: – single and twin piston engine flying training, typically with a wingspan of 12 metres or less (reference code 1A); and– twin turboprops for freight, RPT, charter and aeromedical operations, typically with a wingspan of 18 metres or less (reference code 2B).*

Further explanation is required as to why MAC (GOODMAN) limits future operations to 2B given that Moorabbin previously could accommodate much larger aircraft than this and why this limit will not cause exclusion of potential or actual users in future. [see 7.3.8 Regular Public Transport, below]

In the past Moorabbin airport could accommodate medium sized aircraft, something now made impossible through recent development.

This restriction in recent years potentially may be in breach of the Commonwealth lease, s 3.1 which requires the Lessee to give access to *interstate* and *intrastate air transport* but is silent with respect to aircraft capacity. The average person would consider aircraft capable of being used for *air transport* to include larger aircraft than just light aircraft and whilst the lease terms may be upheld by a technicality with respect to the capability of light aircraft, potentially the spirit and intent of the lease is not, therefore as such a breach exists.

### **5.8.3 Airport Roads p 78**

*Roads and access planning will follow State road planning standards which encompass the following core principles:*

*–transport modes viewed as complementary rather than competitive:*

*–transport plans are integrated with land planning strategies; and*

*–roads contribute to an integrated transport system that strengthen the economy, liveability, social inclusion and environmental outcomes*

No details are provided in this master plan in support the above assertions. The broad statements above are insufficient evidence of both compliance and planning; detailed planning studies must be provided for open review and assessment by all party's involved with or affected by this plan.

### **6.2 Precinct Plan p 84**

#### **para 3:**

*In summary, the Moorabbin Airport Precinct Plan provides land that supports the Airport and surrounding region by:*

*- facilitating safe and efficient aviation functions;*

This is demonstrably not the case. Past master plans have allowed the construction of large buildings which are now a hazard to aviation safety [see: Safety Issues Relating to Wind Shear, below]. This master plan provides for further construction of more large buildings adjacent to runways, which will inevitably exacerbate the safety issue.

Further issues have arisen with the construction of a large earthen hill at the end of runway 31 – optimistically referred to in this master plan as 'Airport Infrastructure' on the Moorabbin Airport Precinct Plan, p 85, a hill that serves no possible aviation infrastructure purpose and is itself an aviation hazard, and the reduction of length in runway 22.

*- retaining long-standing aviation and non-aviation businesses (and the associated employment base) at Moorabbin Airport for the benefit of the City of Kingston and south-east metropolitan Melbourne in all precincts. These businesses include:*

*–aviation businesses that have been based at Moorabbin Airport for decades*

The above master plan assertions need to be supported with detailed plans and evidence as how these claims about the support for present aviation business will be met. Presently aviation operators have been placed in dire commercial situations due to the corporate actions of MAC (GOODMAN) in their pursuit of non-aviation commercial expansion. A number of operators have been displaced from workable commercial sites into inappropriate or unsatisfactory commercial sites on the demands of MAC (GOODMAN). A considerable number of private operators have lost their hangarage for the same reason. This master plan does not provide either the details, or any specific undertakings, as to how these businesses and private operators will be provided for and their interests protected.

*- constructing new and redeveloped spaces and facilities tailored to customer requirements*

*- safeguarding land at the Airport for Airport infrastructure that supports aviation and non-aviation uses.*

It is understood that applications to MAC (GOODMAN) from aviation operators to construct new buildings is routinely ignored by MAC (GOODMAN), as distinct, as it seems, for non-aviation building space construction.

This master plan must provide specific planning detail and assurances as to how aviation building requirements will be addressed and future aviation infrastructure requirements, of all types: aviation buildings, hangars; aviation buildings and hangars co-located as required by operators, associated aprons, parking areas, taxiways, easy and practical access for both operations staff and visitors, associated co-located staff and visitor parking, will be both accommodated and guaranteed; an overall situation that existed at the commencement of the Commonwealth lease but now exists only for a few, for other operators much or all of this has ceased to exist and for further operators it will apparently cease to exist, in all or part, as this master plan stands.

*The Master Plan 2021 includes a reduction in the total number of precincts in the Precinct Plan from seven to five. This adjustment of the Precinct Plan was adopted to:*

*provide customers and users with clarity about the intent of each precinct; and–deliver a Precinct Plan that reflects that the mature nature of the Airport site which will be fit for purpose for the duration of Master Plan 2021 and could be adopted for the subsequent Master Plan period*

Considering the above-mentioned planning deficiencies, this master plan does not provide the comfort for ‘customers and users’ that is claimed in the above two paragraphs.

## **6.3 Land Use & Development Controls**

### **Land use plan - p 87**

This involves removal of sites including present parking and movement areas, up to and including Second Ave and beyond, but without details as to what will be provided in advance of this to allow continuance of present operations, re-location if necessary, if re-location is necessary how this will be done whilst limiting dislocation of business operations, where the re-located sites will be in each case, and how growth will be provided for.

The master plan requires such details, the present lack of which renders it no more than a draft of ideas for the future, not a ‘master plan’ in the sense of the details that a document of that name should, or must, contain.

### **Policy and Development Controls by Precinct and Zone 6.4 p 89**

The master plans provides no development control to provide for aircraft parking. This is mentioned in **6.4.1.1.i. ‘Precinct objectives’** but there is no specific detail as to how this will be delivered. As such this is unsatisfactory and in terms of planning and assurances for future operations, worthless.

ii **Precinct strategies** – does not describe how growth can occur within the planned removal of airside land. Comments as per the above paragraph apply to this aspect also.

### **Safety issue relating to wind shear.**

#### **5.3.3 National Airports Safeguarding Framework Guidelines p 58**

##### **para 1:**

*The National Airports Safeguarding Framework (NASF) Guidelines are a national land use planning framework (consisting of a series of principles and a number of attachments), which aim to:*

- improve community amenity by minimising aircraft noise-sensitive developments near airports; and*
- improve safety outcomes by ensuring aviation safety requirements are recognised in land use planning decisions, through guidelines being adopted by jurisdictions on various safety related issues.*

##### **para 2**

*Commonwealth, State and Territory Ministers initially endorsed the NASF Guidelines at the Standing Council on Transport and Infrastructure meeting in 2012. This included guidelines for:*

- the risk of building-generated windshear and turbulence at airports (Guideline B);*

#### **12.4 Building generated wind shear - p 257**

*Moorabbin Airport reviews the wind engineering assessment against historical wind data in consultation with CASA to ensure there are no unacceptable impacts on safety.*

#### **6.6.2 Airport Lessee Company Consent Process p 102**

##### **Para 1:**

*Moorabbin Airport has established a comprehensive and systematic process for the assessment of building activities.*

##### *iii. Lodgement of the Application*

*Unless otherwise agreed by Moorabbin Airport, an application must be accompanied by the following information:*

- details relating to compliance with relevant NASF Guidelines including windshear and turbulence*

#### **12 1.3 National Airports Safeguarding Framework p 242**

*The NASF is a national land use planning framework, which aims to improve:*

- safety outcomes by ensuring aviation safety requirements are recognised in land use, planning decisions and through the NASF Guidelines being adopted by jurisdictions on safety related issues.*
- Guideline B: Managing the Risk of Building Generated Windshear and Turbulence at Airports;*

#### **12.4 Building generated wind shear - p 257**

*Moorabbin Airport reviews the wind engineering assessment against historical wind data in consultation with CASA to ensure there are no unacceptable impacts on safety.*

A significant issue has arisen in recent years with the erection of buildings very close to the runways; as is apparent, too close to the runways. Wind turbulence on some days is at hazardous levels for aircraft on late final approach due to the creation of wind turbulence by these buildings, to the extent

that senior instructors report the conditions as being dangerous for inexperienced pilots, including of course students. This hazardous zone is very close to the adjacent taxiway which is often occupied by taxing aircraft with one or more occupants and where loss of control on landing would likely also imperil these persons and planes. This hazard, created by non-aviation development, did not formerly exist.

MAC (GOODMAN) acknowledge that Moorabbin is a training airport. This reduction of safety and creation of risk is therefore a serious issue for student pilots and pilots with low experience at the 'busiest training airport in Australia' [7.1.1] and 'second busiest airport in Australia' [12.1.2].

The creation of this hazard to air navigation and safety risk is possibly in breach of the lease, s 9.2:

*Maintenance of runways and pavements*

*The lessee must maintain the runways, taxiways, pavements and all parts of the airport essential for safe access by air transport to a standard no less than the standard at the commencement of the Lease.*

It is perhaps fortunate that to date there has not been a loss of life or injury, or damage to property.

A review of the building approval process is required, as is an explanation of how this danger has been allowed to come into existence and what will be provided for in this master plan to remediate the risk.

The details of wind studies and data collected need to be provided for independent and open review by experts to discover how decisions have been made in the past, how past decisions may inform future planning decisions and to ensure that sound planning decisions are made in future with a proper safety and risk assessment.

Claims made about wind studies and turbulence to date, as advised by MAC (GOODMAN) but without the provision of specific details or data, as generally understood by Moorabbin operators, that is, that no increase of hazard or risk was created by the construction of these buildings, are plainly wrong. Prima facie it seems that these same or similar studies may be being relied on with respect to future non-aviation construction plans as outlined in the master plan.

The safety risk and air navigation hazard that has been created by MAC (GOODMAN) is acknowledged by the Airservices Australia, AIP, [ERSA, Melbourne/Moorabbin](#) [3]

**ADDITIONAL INFORMATION:**

2. *Possible wind shear and turbulence:*
  - a. *West of RWY 04 THR when wind FM west south westerly direction at 22KT and ABV.*
  - b. *On RWY 17R/35L and south of 35L THR when wind FM south westerly direction at 26KT and ABV.*
  - c. *On RWY 13L/31R when cross wind exceeds 10KT FM easterly sector BTN BRG 310 - 130 MAG.*
  - d. *North of RWY 13L/31R when wind FM west south westerly direction at 28KT and ABV*

*The Australian Government Bureau of Meteorology, Moorabbin Airport site information, 3PM wind speed vs direction plot, [annual](#), [4] demonstrates that the prevailing wind at Moorabbin airport is from the south west, that is from 225<sup>o</sup> with a speed of up to 11 knots for 18% of observations, from 10 knots up to 16 knots for 18% - 33% of observations, over 16 knots for 5% of observations and occasionally greater than 22 knots. Strong gusts from an easterly sector [c] are less frequent but nevertheless occur at a statistically significant level.*

Whilst Airservices Australia's warning confirms the hazard the warning is considered by experienced instructors to understate both the problem and the risk, especially for inexperienced pilots.

The Civil Aviation Safety Authority's [CASA] Sector Safety Risk Profile for the Flight Training Organisations Sector, Risk Register:

Risk Runway Excursion (operating environment conditions)

Current controls: This risk covers runway excursions due to operating environment conditions such as aerodrome infrastructure (including pavement, markings etc.) or weather/environmental conditions.

Treatment Description: Appropriate selection of training environment.  
Limitations of development at/near aerodromes to reduce mechanical turbulence

The risk assessment identifies the issue of building generated wind turbulence as a both a Current and Residual risk, rating 6b - medium level risk, as such requiring Flight Training Organisations to put in place risk management procedures to address this risk. Such risk management was not previously required at Moorabbin airport.

The creation of this safety hazard is completely at odds with MAC's (GOODMAN) opening statement about the master plan. 1.1.1 Overview p 10:

*Moorabbin Airport is Victoria's leading metropolitan based flight training airport. Moorabbin Airports core role is to support safe general aviation flight training operations*

**The Victorian State Government, Department of Environment, Land, Water and Planning, [Melbourne Airport Environs Safeguarding, Standing Advisory Committee Issues and Options Paper 23 April 2021](#) [5] p 37, notes the following:**

#### **NASF Guideline B: Windshear**

##### **(i) What is the issue**

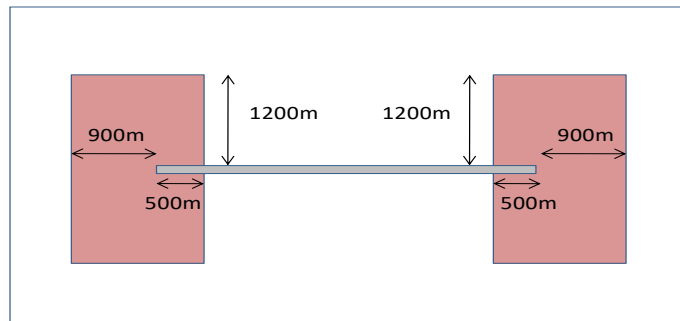
*Building generated windshear and turbulence is caused when a significant obstacle, such as a building, is located in the path of crosswind to a runway. The wind flow is diverted around and over the building causing unstable airflow potentially compromising aircraft flight. In Australia there have been at least two serious incidents involving building generated windshear (both from buildings within the airport grounds).*

**[The National Airports Safeguarding Framework \[NASF\] \[6\] Guideline B, document: 2.2.5 Guidleine-B-Windshear-1.doc, p 6](#), notes the following:**

#### **Key Considerations for Managing the Risk of Building Generated Windshear and Turbulence at Airports**

##### **Mitigation of risk by building siting and location**

1. *Research conducted by the Aeronautical Research Laboratory of the Netherlands (NLR) indicates that safety risk is highest below 200ft (61m) above the runway. This research was conducted in response safety incidents at Amsterdam airport caused by building induced wind effects.*
2. *Buildings that could pose a safety risk are those located within a rectangular 'assessment trigger area' around the runway ends (see Figure 1, below):*
  - a. *1200m or closer perpendicular from the runway centreline (or extended runway centreline);*
  - b. *900m or closer in front of runway threshold (towards the landside of the airport); and*
  - c. *500m or closer from the runway threshold along the runway.*



**Figure 1: Assessment trigger area around runways, within which buildings should be assessed**

**Figure 6.1 Moorabbin Airport Precinct Plan p 86** provides incontrovertible evidence of the building development at Moorabbin airport, its proximity to runways, and therefore the safety risk as identified by NASF.

As planning at Moorabbin airport has demonstrably failed to address a serious safety issue, and worse, has allowed a serious safety issue to be created, and as this safety issue is not properly addressed in this master plan then clearly, on safety grounds alone, this master plan should not proceed, notwithstanding a multitude of other fundamental planning issues.

## 7.2 Aviation Safety – p 118

### para 4

*Moorabbin Airport has a comprehensive suite of safety systems, policies, procedures and manuals, including the:*

*- Airport Surveillance, Inspection, Reporting and Maintenance Regime.*

*Safety impacts all aspects of the Airport and its activities and underwrites the daily operation of Moorabbin Airport.*

This last claim appears to be made more in hope than in reality.

Members of the Moorabbin Airport Chamber of Commerce have both made enquiry and complaint, that none of the security cameras at Moorabbin airport are presently operational.

Further, the attention of MAC (GOODMAN) has been drawn to the fact that many of the security lights are not operational.

Despite a number of complaints, nothing has been done, this despite such security being a requirement of the Commonwealth as well as a practical necessity due to thefts on the airport, this also advised to MAC (GOODMAN).

The situation should inform those who have the responsibility for decision making with respect to the acceptance of this proposed master plan.



### **7.3.3 Providing for growth p 124**

#### **para 1**

*In preparing this ADP, the future needs for aviation customers and airfield development have been identified and informed based on anticipated aviation activity at the Airport.*

#### **para 3**

*These future aviation activities, including the opportunity to grow such activities, are further considered below. A plan showing planned aviation infrastructure works to support these activities is shown in Figure 7.5.*

Details of the planning and assessment of future aviation activity and associated requirements needs to be provided. Whilst Figure 7.5 Aviation Development plan - p 125 is useful it lacks specific detail as to how the complex requirements for both existing and future aviation operations will be met. As it stands the detail in the master plan is entry-level conceptual and cannot be considered an analytical and detailed plan for the future that will guarantee the undertakings given by MAC (GOODMAN) with respect to the needs of aviation both in the present term or in the future.

### **7.3. 8 Regular Public Transport - p 130**

There is no provision made for future operators other than the one existing RPT operator, KIA.

Considering Australia's, Victoria's, and Melbourne's population growth, and the increasing demand for aviation operations of all types and considering that Moorabbin airport is a public asset belonging to the people of Australia, who have the right to rely on the Commonwealth making reasonable provision for their aviation needs, including where necessary access to regular public transport, and the means and provision for operators to provide such services, the lack of provision in this plan is egregious.

This lack of provision may be in breach of the Lease, s13.1, Development.

### **7.3.9 Aircraft parking, hangars and hardstand - p 130**

*- 100+ between runways 17L/35R and 13R/31L, noting rolling and preparation works are required. This area is planned to be an all-weather grass surface and would suit operators seeking long-term parking arrangements for infrequently used aircraft.*

There is no provision for access – either by aircraft, by car or by foot, identifiable in this plan. If it is to be accessed by car – possibly the only practical way from the operational areas of the airport for planes already parked in this area, there is no road or car parking spaces identified. As this essential operational aspect of this element of the master plan is omitted it renders it worthless.

## **9.3 Mode of Transport p 171**

### **9.3.1 Existing Mode Shares**

*Existing journey to work behaviour indicates that travel to the Airport is dominated by private vehicles, with very low mode share for other forms of transport. This reflects the Airport's location, which is very well serviced by the arterial road network and has opportunities to improve public transport (including a train station), walking and cycling accessibility.*

The master plan provides no planning detail or evidence to support the above assertions with respect to opportunities for improved public transport including a train station, this latter aspect, prima facie, appearing to be a far-fetched and most unlikely proposition, illustrative of the generalised but unsupported contentions throughout this master plan, which ought to give pause for thought to those whose task it may be to approve it.

## 9.4 Existing Road Network p 173

### 9.4.1 Existing External Road Network

p 174

*An assessment of available traffic signal data indicates that there has been a marginal increase in the traffic volumes on the road network adjacent to the Airport in the last five years. This stabilisation of traffic volumes has occurred despite significant developments being undertaken at the Airport, indicating that development has not resulted in adverse traffic impacts adjacent to the Airport.*

No studies regarding traffic volumes and management, and no supporting data, is presented to support these claims. Without supporting evidence this claim is conjecture and one at odds with anecdotal views provided by Moorabbin airport users and members of this Chamber.

The master plan fails to address the reasonably predicted resultant large increases in traffic from the recent major commercial building construction on the airport as part of the 2015 master plan and the further large increase that will occur as a result of construction as set out in the 2021 master plan.

The claim that '*This stabilisation of traffic volumes has occurred despite significant developments being undertaken at the Airport, indicating that development has not resulted in adverse traffic impacts adjacent to the Airport*' is misleading in that the majority of commercial construction that will impact on the main roads and access into and around the aviation areas of Moorabbin airport; the areas of concern of course to aviation operators, has not yet been completed, therefore the claims with respect to traffic volume and its effects cannot be substantiated.

The view of Moorabbin operators and Chamber members is, universally, that traffic volumes will increase considerably and without improvements to traffic management and control will result in dangerous conditions for vehicular traffic of all types and pedestrians, in Grange Road in particular, but not limited to that road.

## 9.7 Car Parking p 180

### 9.7.1 Existing Car Parking

*Moorabbin Airport provides 5,350 off-street car parking spaces. Car parks are distributed across the Airport (as illustrated in Figure 9.9) to ensure that centres for employment, retail, business and aviation activities provide sufficient car parking to meet user demand.*

*The provision of adequate and conveniently located on-site car parking contributes to the economic objectives of the Airport and encourages visitation to the Airport site.*

*Moorabbin Airport considers the suitability of car parking provision in relation to each new development at the Airport.*

No detailed information is presented to support the claims in this master plan with respect to parking places available. Without specific supporting evidence as to the claimed number and accessibility of parking places the parking claims are conjecture. As such this aspect of the master plan cannot stand.

Of the total number of car parks claimed in paragraph 1, above, **Figure 9.9 - Existing off-street car parking – p 181** indicates that of this total only 1065 car parking places exist within the Moorabbin airport aviation area. However, a large part of this area has now been resumed for the construction of commercial buildings and also within this area much of the existing parking is now occupied by persons attending a large aviation training organisation.

Aside from some car parking places that may be available in the DFO and Kingston Central Plaza sites, the rest of the parking sites are inaccessible to persons driving to the airport for airport operations reasons. 450 of these claimed sites are claimed to be in a 'car yard' that is in fact not only remote from the airport operational areas but is also locked behind a high security fence. 10 parking sites appear to be in the BP service station on the somewhat remote south eastern corner of the airport land. I

## 9.7.2 Future Car Parking p 181

*Moorabbin Airport will ensure that appropriate on-site car parking is provided in the future to meet demand for parking as a result of new industrial, commercial and retail development at the Airport (see Chapter 8 - Non-Aviation Development Plan for details of proposed industrial, commercial and retail developments).*

*Car parking for new developments and future vehicle use at and around the Airport is assessed by a qualified technical traffic consultant to ensure the right amount of car parking is always provided at the Airport. Each new site provides parking for relevant parking requirements and off Airport parking is not required. It should be noted that the Airport has excess capacity to meet the needs of current Airport visitors and users. Moorabbin Airport will continue to install electric vehicle charging stations where appropriate at new developments on the Airport site.*

*Where possible, demand for car parking will be addressed by increasing the efficiency of land use and car parking areas through the sharing of car parking resources. This aims to ensure that all car parking infrastructure provided will be utilised efficiently and prudently. If in the future the State government was to place a Suburban Rail Loop Station on or near the Airport, it is expected that the State will provide sufficient parking to address Suburban Rail Loop users.*

No information is presented to support these claims.

A detailed study of parking requirements and their provision, including location and accessibility is required. This study must assess both present and future needs. As land is being resumed apparently to the maximum extent possible for commercial development and as available space for future requirements will evidently become limited, or non-existent, such planning is essential.

As such these claims must be set aside until supported with evidence.

The statements that '*demand for car parking will be addressed by increasing the efficiency of land use and car parking areas through the sharing of car parking resources*' requires an explanation as to what this claim actually means, together with detailed evidence to support what is contended.

The further claim that '*If in the future the State government was to place a Suburban Rail Loop Station on or near the Airport, it is expected that the State will provide sufficient parking to address Suburban Rail Loop users*' whilst apparently not a commitment that this master plan can make, it nevertheless raises hopes and possibilities that are advantageous to the assessment of this master plan in MAC (GOODMAN)'s favour should such a development eventuate. As such, an explanation is required as to the basis on which this claim is made and its likelihood of success.

Further explanation is required as to the expectation raised that '*the State will provide sufficient parking to address Suburban Rail Loop users*'. The master plan must address what is so far lacking: that is, why MAC (GOODMAN) contends that the State will make such provision, why it is reasonable to include what prima facie appears to be an unlikely State provision, why, if this claim is not based on a serious likelihood of this claim eventuating it is not therefore misleading in the context of this master plan and if the State did in time make such provision, where, and how, will the State so deliver. As this station and parking is apparently envisaged to be on Moorabbin airport land, on a lease controlled by MAC (GOODMAN), who propose to use all of the land for their commercial purposes, it is incumbent on MAC (GOODMAN) to explain how this will be accommodated, supported by detailed evidence. To

claim that an element of this master plan that will require considerable land resources will, by some means unexplained, be provided by the State is unacceptable.

### **Actions and Relief Required:**

- That this Master plan is not approved by the Minister
- That demonstration be provided that what has been done by MAC (GOODMAN) at Moorabbin airport since the inception of the Commonwealth's lease, 18 June 1998 with MAC, has been done in accordance with the spirit and intentions of the Airports Bill 1996, as set out in the Minister's statement to the Federal Parliament as an explanatory memorandum in the second reading and that what is set out in the master plan for the future is also in accordance.
- That a demonstration be made that the terms of the Commonwealth lease have been strictly met.
- That an embargo be placed on any further infringement of any and all presently existing space that could or may be used for aviation operational purposes or purposes of any sort associated with aviation operations, be put in place with immediate effect.
- That MAC (GOODMAN) be required to remediate any development that does not accord with the Airports Bill 1996 second reading explanatory statement by the Minister to the Federal Parliament, the Airports Act 1996, or that has been made contrary to a strict interpretation of the provisions of the Commonwealth's lease.
- In the opinion of the Moorabbin Airport Chamber of Commerce Incorporated, prima facie aspects of the present developments and the impact of those developments on commercial and private operators and operations at Moorabbin airport are contrary to, or are in breach, the spirit, or a literal interpretation, of the undertakings and assurances provided by the Minister's statements to the Federal Parliament in the Airports Bill 1996 explanatory memorandum, and the Commonwealth's lease, and that this situation will or may be further exacerbated by the developments set out in the Master Plan 2021. As such this master plan must be set aside.
- That any future master plan be developed in full compliance with the Airports Bill 1996 explanatory memorandum, the Airports Act 1996 and with the Commonwealth's lease, with all required consultations and studies, with full and specific detail, and with full supporting and independently verified data, statistics and analyses.

The Executive,  
On behalf of the members  
Moorabbin Airport Chamber of Commerce Incorporated  
Incorporated Association No. A0057997G ABN 32 465 826 389  
PO Box 240  
Braeside 3195

12 July 2021

## LINK REFERENCES

- [1] <https://www.goodman.com/who-we-are/about-us>
- [2] <https://www.goodman.com/who-we-are/our-values>
- [3] [https://www.airservicesaustralia.com/aip/current/ersa/FAC\\_YMMB\\_25MAR2021.pdf](https://www.airservicesaustralia.com/aip/current/ersa/FAC_YMMB_25MAR2021.pdf)
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