

The No 3rd Tulla Runway Coalition

We thank Dr. Daniel Mulino MP for Fraser for this opportunity to present community concerns over the third runway development at Melbourne Airport.

The Coalition is an alliance of community groups concerned about the impact of the aviation industry on communities and the climate, our purpose is to give a voice to concerned residents and the general public.

We share support with other community groups at Brisbane, Gold Coast, Greater Western Sydney, Sydney, Perth, Hobart airports.

The concerns being expressed here today are representative of Australians impacted by airport development.

A number of other councils have expressed concerns with the third runway Major Development plan and have made specific recommendations to address health, noise, amenity and environment impacts in their submissions to the 2022 airport master plan and third runway MDP.

We hope our presentation will provide sufficient information for a review into the third runway MDP.

Aircraft Noise

The commonwealth and airport operators define and treat aircraft noise as an annoyance

- Aircraft noise is not merely irritating. It is damaging to health, wellbeing, learning and cognitive function.
- In Australia, communities are subjected to levels of aircraft noise well beyond the World Health Organisation (WHO) recommendations, and have no legal protection against it.
- There are no limits to the loudness or number of noise incidents around Melbourne Airport at any time of the day or night
- There are no hourly aircraft movement capacity limits
- Commonwealth refuses to consider curfew restriction as it had legislated for Sydney and Adelaide airports.
- The Melbourne Airport operator, Australian Pacific Airport Melbourne (APAM) hides behind the commonwealth shield and avoids responsibility to compensate impacted communities to install noise attenuation measures.
- The Victorian Planning scheme uses the deemed to comply provisions to determine building compliance to AS2021 – Aircraft Building Standard, without actual sign off of compliance, this leaves Victorian un-protected from avoidable harmful noise impacts.
- In contrast Heathrow Airport London, is offering property buy back schemes funding noise attenuation of residential dwellings.

- The National Airport Safeguarding Framework (NASF) and the The Melbourne Airport Environment Strategy Overlay (MAEO) have little relevance as most if not all the residential areas around Melbourne airport have been populated since before these regulations were legislated.
- The last study into community response to aircraft noise was conducted in 1982. A new study of community responses to aircraft noise in Australia is overdue. in the UK there have been four studies, in 1961, 1967, 1980 and 2007. During that time, community tolerance of aircraft noise has decreased.
- Clearly industrial noise is not acceptable to people living near major roads, train lines and windfarms, where corresponding regulation is legislated to limit noise harm, however communities subjected to aircraft noise impact are not afforded similar protection from federal & state government.

Aircraft noise is linked to serious health and educational effects.

We have qualified evidence from the health assessment by Taylor & Tonkin for Brimbank Council which concluded the Third Runway MPD, failed to adequately demonstrate the runway expansion would not result in significant impact to community health, amenity and environment.

Impairment to Children leaning and Cognitive development Learning.

School children who live and go to school within the ANEF 20 and ANEF 25 contours are predicted to experience delay in reading and oral comprehension of between 3 and 5 months compared to children in lower noise areas.

These events are associated with heart and cardiovascular disease, sleep deprivation, anxiety and mental state.

Australia lags behind worldwide trends in implementing noise level set by the World Health Organization (WHO) 2018.

The WHO states, outside noise limits should not exceed 40db at night and 45db during the day.

The Melbourne airport third runway MDP reports only noise levels above 60db, which is twice as loud of the WHO noise limit of 40db.

It assumes a noise reduction of 10db for residential dwellings to achieve compliance to AS2021 acceptable noise levels. Melbourne Airport have not provided an acoustic assessment to substantiate noise level reduction in homes built to the building approved standard of 1970.

Flight Paths as a measure to mitigate Aircraft Noise.

APAM inform us the best solution to reduce aircraft noise impact is through the design of flights paths. We have seen the outcome of such promises in Brisbane.

Airservices does not design flight paths until a runway is approved, which avoids public scrutiny.

The promise the design of flight paths to avoid populated areas, is false hope and cannot be achieved, specifically at Melbourne Airport at it is land lock in all directions and the neighboring suburbs have been populated before the Airports Act 1996 was legislated.

Legislative curfew operations are the only effective measure to achieve measurable outcome.

Aircraft Noise Complaint reporting

Noise complaints reporting is in-effectual and produces no beneficial outcomes for communities.

Airservices Australia utilizes the noise complaint reporting to identify complainants and not the level of noise complaints.

Climate

At this most critical stage of the climate emergency, Melbourne Airport is proposing that its flight emissions increase by 55%.

We estimate a total annual warming from the Third Runway flights to be around 16 million tonnes of CO₂, this is comparable to the 18 million tonnes of CO₂ from Australia's dirtiest power station, AGL Energy Limited's Loy Yang.

Melbourne Airports CO₂ emissions are achieved through offset mechanisms, which reports vastly lower CO₂ emission than our estimation based on the Third Runway flights.

Australians are calling for more significant cuts amid rising concern from flood water damage and bush fire events. The recent global climate events increase pressure on our governments to do better.

The proposed Third Runway must be halted because the impact of increasing global heating emissions is an un-acceptable risk to society as we know it.

There is concern with APAM environmental management, in 2019, it become known PFAS escaped the airport estate.

APAM failed in its responsibility to have identified the types and storage of industrial chemical by its tenants when it became the airport operator in 1997-8.

PFAS is used in firefighting applications and is widely known to be a chemical of significant potential human harm.

APAM failed to establish and implement appropriate measures of containment which resulted in the contamination of waterways that feed into the Maribyrnong River.

Biodiversity Woodlands Threatened with extinction.

The Grey Box Woodland covering 136.57 hectares has two ecosystem communities now threatened with extinction. Listed under the Commonwealth Environment Protection and Biodiversity Conservation Act (EPBC) as Grey Box and Grassy Woodlands, and the Derived Native Grasslands of South Eastern Australia, they are protected by the EPBC Act.

The Melbourne Airport Third Runway economic impact assessment concludes “There are no significant negative economic impacts” and “All of the Third Runway impacts can be considered as economic benefits.”

This conclusion flies in the face of other recent economic assessments of other proposed airport expansions.

The Third Runway MDP overstates the job losses of a No Build scenario, it assumes all people employed in the Build scenario would remain un-employed in the No-Build scenario.

The state economy would develop in different ways, diverting budgets and investment may well be spent elsewhere, leading to employment and contributions to GDP in other areas of the economy.

The third runway development requires additional infrastructure support by way of:

- \$15 Billion for a Melbourne Airport Rail Link
- \$8 Billion Costs estimate for the Third Runway-induced traffic congestion a year by 2030, could be avoided by building High Speed Rail up the east coast of Australia.
- Melbourne Suburban rail loop at an estimated cost of \$130 Billion, to transport the Victorian population to a one airport city.

The Melbourne third Runway proposal fails to consider alternate airport infrastructure availability.

- Avalon airport is under utilized and has the available capacity to accommodate aviation demand in short to medium term.
- Proposed addition airport East of Melbourne
- Previous Commonwealth and state governments have adopted plans for an addition airport located east of Melbourne, for when the Melbourne population reaches 5 million people.
- The additional airport has been in the planning since 1970 and subsequent federal governments-initiated investigations to select appropriate site in 1990-1992. The Victorian Planning includes an airport east of Melbourne

High speed rail ignored

- The MDP excludes any assessment of the risk to the airport’s business growth forecasts from the development of a high speed rail service up the east coast from Melbourne to Sydney and Brisbane. This is irresponsible given that establishing a High Speed Rail Authority is federal Labor policy

Inadequate Consultation

The Melbourne Airport Community Aviation Consultation Group (CACG) is a failed process and is self serving.

The Public is not invited to CACG meetings since 2018. The public is not allowed to discuss directly with CACG members and has to communicate through Melbourne Airport.

The CACG has not recorded minutes where the Third Runway was debated
No public questions on the third runway were recorded.

Melbourne Airport ran master plan and third runway public comment periods concurrently.

The community consultation process was inappropriate and inadequate and was not consistent with the Airport Act 1996 and the Airport Development Consultation Guidelines 2012.

Communities were denied equal opportunity for separate public comment periods for the 2022 master plan and third runway MDP, as has been the practice at other commonwealth airports in Brisbane and Perth.

Communities were given 72 business days in which to understand and respond to highly technical documents comprising of over 2300 pages.

The airport Act 1996 determines a public comment period of 60 business days for airport master plans with no variation provision. The act also determines a public comment period of 60 business days for airport major development plan, with a provision for ministerial variation.

Concurrent public comment periods are not expressed with in the airports act, therefore we believe the process employed by APAM is outside the act.

It is unreasonable to have expected people to consider items in the airport master plan whilst simultaneously considering items in the third runway MDP. Logic will confirm a time moment spent on the master cannot be re-spent on the third runway MDP, this is a breach of Part 5, Division 4, Section 92(2A) (a) (b).

Summary

What we requesting on behalf of the people of Fraser is:

Pass on the concerns about the legitimacy of the third runway MDP expressed today to minister King.

In the knowledge there is no legislated curfew, our homes are no to a standard for aircraft noise, our environment is at threat, increasing traffic congestion and the planning for over 420,000 aircraft movements per year, how are you satisfied the third runway will not result in significant impact to community health, amenity and environment to the people of Fraser.

There is strong qualified evidence which casts doubt the health and environmental assessments put forward by Melbourne Airport.

Support your community and make representation to have the Quigley & Watts health assessment and peer review release for public view.

Seek action from the Federal Minister of Infrastructure on the findings, conclusions and recommendation of the Taylor & Tonkin health assessment.

Support legislated curfew operations at Melbourne Airport as the only equitable solution.

Make representation on behalf the people of Fraser to the Federal Minister for Infrastructure and transport, Catherine King requesting the Melbourne Airport Third Runway MPD be returned to APAM for recommencement of the consultation and public comment period to be consistent with section 79 and 92 of the Airports Act 1996.

We thank you for your consideration and look forward to your reply and further communication on this issue.

On behalf of
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