

The Moorabbin Airport Chamber of Commerce Incorporated (MACCI) membership representation is broad and includes business from aviation maintenance, aircraft charter, pilot training, aircraft components, retail business aviation and non-aviation, aircraft owners, pilots, and users of the airport.

Moorabbin Airport Corporation (MAC) owned by Goodman Property Group hold the head lease from the commonwealth since 23rd of June 1999. Many of the members of the Chamber were operating on Moorabbin Airport prior to this date under the management of the Federal Airport's Corporation.

The Airport's Act came into effect in 1996 when the Commonwealth granted 99 year leases to the airports it owned.

The objects of this Act are as follows:

- (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;
- (c) to promote the efficient and economic development and operation of airports;
- (d) to facilitate the comparison of airport performance in a transparent manner;
- (e) to ensure majority Australian ownership of airports;
- (f) to limit the ownership of certain airports by airlines;
- (g) to ensure diversity of ownership and control of certain major airports;
- (h) to implement international obligations relating to airports.

When the airport lease was transferred to the MAC the existing aviation tenants some of whom are members of the Chamber were under the impression that there would be some protection for their businesses under the Airports Act, however it appears this is not the case.

The Airports Act since inception requires the Airport Operator Company to submit a preliminary draft master plan to the government every 5 years (from 2021 it will be 8 years) for ministerial approval. The current 2021 preliminary draft master plan is in its consultation process at this time with submissions initially due by the 12th of July 2021 and now extended to 28th October 2021 due Covid.

In 2020 there was 5 aviation businesses during the Victorian Covid lockdown that were given a 6 months' notice eviction letter. Currently most airport aviation tenants have a 6-month redevelopment clause on their leases. If Covid wasn't bad enough, these businesses had to vacate their buildings and try and find suitable tenancy on the airport in a very short time frame. The business involved were not newcomers to the airport some had more than 35 years in operation at Moorabbin Airport. The reason for their evictions was to clear the way for the Airport Operating Company to build 3 exceptionally large commercial warehouses. These enormous structures were apparently in keeping with the 2015 master plan which had been signed off by Minister Darren Chester.

How is it that none of these businesses or other airport tenants were aware of this development until the eviction notices arrived? There were fewer than 10 submissions to the preliminary draft master plan process in 2015, none from those businesses involved. If appropriate consultation had taken place, or had tenants and operators been provided with a straight-forward, clearly intelligible draft master plan for the future, rather than what was presented: a complex, difficult to understand, obfuscating 2015 draft Master Plan: 310 pages of professional complexity beyond the comprehension of most, then perhaps the assumption may be made that those businesses involved would have been at the least notified and have a basic understanding of what could take place in the next 5 years of the master plan. We assert that in the circumstances, they did not.

The Airports Act does provide for consultation on the preliminary draft master plan, and it also requires —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. That clearly didn't happen, and the airport has not been open with its aviation tenants.

In the submissions to the Future of Aviation Reference Paper, the Australian Airports Association along with Bankstown and Moorabbin Airports want the government to renew their leases early. They have called for *federally- leased airports to exercise the option to extend their leases and provide greater certainty for master planning and development on airport land*. This certainty is not being provided to aviation tenants at Moorabbin airport who are given 6-month redevelopment clauses in their leases.

Over the past 18 months Moorabbin airport has seen aviation businesses displaced, some have also vacated the airport completely and a large parcel of land used for aviation removed and replaced with giant commercial warehousing. If the aim of the approved 2015 master plan was to make the airport more efficient, why do we now have aircraft taxiing up to a dead end on the western apron and reduced parking for aircraft across the airport site?

In 2019 Moorabbin airport was responsible for 27 % of all the Commercial pilots produced in Australian along with 67% being produced at commonwealth leased Metro D airports. The value of these airports to aviation for training pilots, and the economic benefit to the country is being overlooked for the dollar value of the land the airport site occupies.

Over the past 15 years Moorabbin airport has seen commercial developments surround its perimeter, some of which create additional wind turbulence for aircraft taking off and landing. All of which the aviation community has had to suffer. Promoted as the number one training airport the surrounding development has degraded the student training experience rendering training operations grounded on certain days due to wind shear from the additional buildings.

General aviation could almost be considered a cottage industry, lots of small businesses run by people with passion and enthusiasm to deliver strong outcomes for the industry. The one thing that unites them is their place of business, which by design is an airport. Airports are vital pieces of infrastructure and governments would be served well by forward thinking and protecting their assets from overdevelopment.

2021 sees new and emerging technologies in the aviation space and reservation of land such as airports should be at the forefront of government policy. You wouldn't put a warehouse in the

middle of a motorway so why let overdevelopment of federally leased airports for non-aviation purposes occur?

Major Development Plans-

The Airports Act calls for a Major Development Plan which requires approval from the Minister for any development more than 25 million dollars. Once again airport operators are calling for this amount to be lifted. It is not so much the cap that presents a problem. There is an issue with the process as the amount is only approved at the onset planning phase of the development. If there are significant overruns it could easily be exceeded without a trigger. The Act does not consider separate projects during the initial period of the airport master plan. There could be 5 x 24 million projects with no additional oversight. The Chamber would like to see this rectified and a clearer statement of impact to the aviation community added to any developments.

In deciding whether to approve the plan, the Minister must have regard to the following matters:

- (a) the extent to which carrying out the plan would meet present and future requirements of civil aviation users of the airport, and other users of the airport, for services and facilities relating to the airport concerned.

The information that was provided in the 2015 Master plan was insufficient to be able to determine this. The 2021 preliminary draft master plan also lacks detail.

What can be determined from the 2021 preliminary draft master plan is that the sites of 11 aviation businesses some of over 30 years standing will be removed to make way for additional commercial development which is not aviation. At this point in time no suitable location has been provided for those concerned. As has already been mentioned unlike many other businesses aviation businesses require an airport to operate and options for relocation are more limited than for warehouse developments.

If the Government is serious about having a vibrant general aviation industry that can meet the future needs of its growing population it must seriously review its approach to regulation of airports, including the overdevelopment of non-aviation on its Commonwealth leased airports and its impacts on aviation growth.