

BFPCA Submission to the Aircraft Noise Ombudsman

Executive Summary

April 2021





Brisbane Airport New Parallel Runway BFPCA Submission to the Aircraft Noise Ombudsman

Executive summary (April 2021) of the full submission (Feb 2021)

Prepared by **Brisbane Flight Path Community Alliance (BFPCA)**

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ANO Submission Scope and Structure

This submission has been prepared by Brisbane Flight Path Community Alliance (BFPCA) in response to the Aircraft Noise Ombudsman's (ANO) Dec 2020 multiple complaints review of aircraft noise in Brisbane as provided for in clause 47 of the ANO charter, specifically:

- Airservices Australia (Airservices) engagement with the community as part of the flight path design process;
- Airservices environmental assessment of the impact of the flight paths associated with the new runway.

BFPCA brings together community members adversely affected by Brisbane Airport's new runway flight paths. Collectively and as individuals, BFPCA members have been attempting to resolve concerns with aircraft noise via multiple pathways, including:

- Airservices' aircraft noise complaints system;
- The Brisbane Airport Community Aviation Consultation Group (BACACG);
- Direct engagement with Airservices and BAC as part of a technical airspace design workshop held on 24 February 2021.

To date, there has been an unwillingness on the part of Airservices and BAC to recognise the identified consultation deficiencies and to reasonably mitigate the excessive noise, health, education, and other environmental impacts of the airspace design.

The BFPCA submission to the ANO served to document BFPCA's concerns and to provide suggested recommendations for the pathway forward. The full submission was structured as follows:

1. A chronological review of consultation activities from the perspective of the community, with a particular focus on the 2006 – 2007 draft Environmental Impact Statement (EIS) process;
2. An assessment of the noise impact of the new runway as implemented – how aligned is the outcome with representations made to the community;
3. A summary of the community experience as captured by a BFPCA-led survey of affected residents in December 2020 to January 2021.

BFPCA is hopeful a positive response from the ANO will be issued in June/July 2021.

Introduction

The noise pollution from Brisbane Airport's new flight paths has adversely affected people living, learning and working in impacted communities. Affected community members face the prospect of exposure to unexpectedly severe aircraft noise levels that can have a devastating impact on individual well-being. The noise pollution has also significantly damaged the character, liveability and natural amenity of a significant portion of the greater Brisbane area.

BFPCA acknowledges the significant role of the aviation industry in Brisbane and the direct and indirect economic benefits of infrastructure such as the Brisbane airport. We note that many communities in Australia and around the world successfully co-exist with major airports through transparent collaboration with the community, and a commitment by project proponents to minimise community noise impact to the greatest possible extent.

The development of Brisbane Airport's new runway has instead failed to properly inform or consult affected residents, and delivered an acute and unreasonable noise impact well beyond levels anticipated by the community. BFPCA has identified clear evidence of systemic and compounding deficiencies of Airservices and Brisbane Airport Corporation (BAC) in fulfilling its core consultation obligations.

Key Findings Summary

1. A long-term pattern of misleading community engagement by the project proponent

From project conception onwards, BAC established a pattern of communication which downplayed the adverse impacts and over-sold the benefits of the new runway. The insufficient reach of the EIS consultation process resulted in many community members relying almost exclusively on media coverage for information, which was frequently inaccurate, misleading, or framed in ways that propagated the community's misunderstanding (Figure 1).

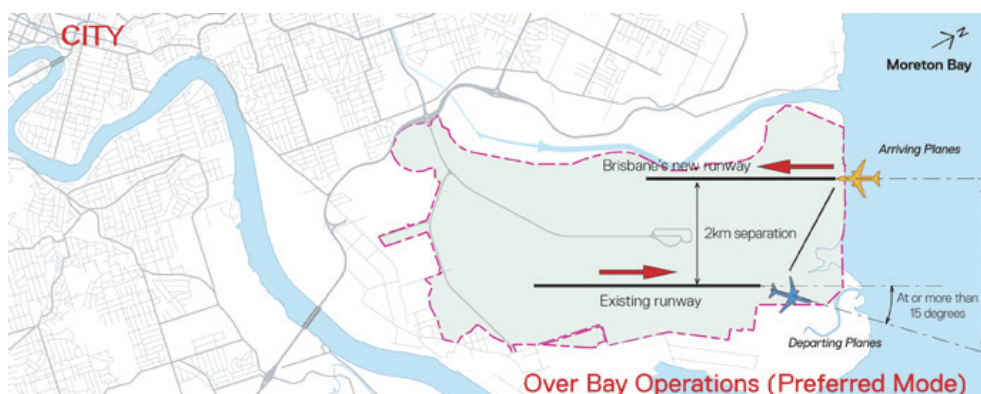


Figure 1: BAC misled the community by framing over-the-bay operations as the “preferred mode” when BAC already knew at that time that daytime utilisation was expected to be low, or almost zero, as is now the case. Source: BAC.

2. A failure to adequately consult directly affected community members

The 2006 / 2007 EIS consultation process utilised blunt and low-efficacy tools (such as newspaper advertisements, media releases, intercept engagement at markets) instead of targeted engagement of community members under flight paths, for example those located within the N70 or N60 contours (Figure 2). The failure of BAC and Airservices to do so represents a fundamental deficiency against best practice standards typically employed by all levels of Australian government for major projects.

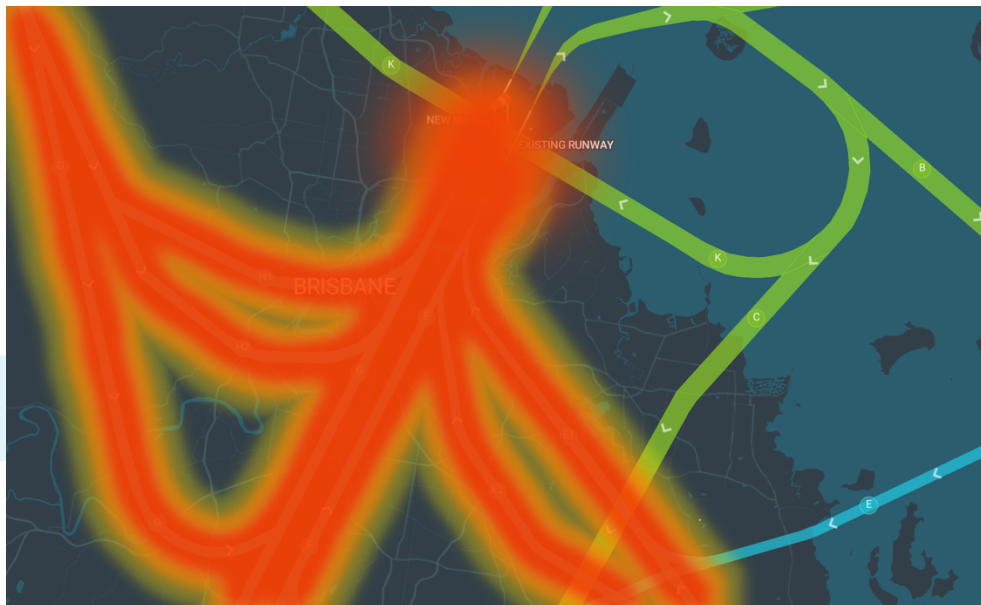


Figure 2: Rather than BAC's radial approach to community engagement, a linear approach would have directly engaged with residents affected by the new flight path architecture.

3. An insufficiently rigorous community impact assessment

The EIS did not properly consider or assess the high number of new residents expected to enter affected areas over the long development period and during operations. The impact assessment also failed to adequately identify and mitigate the well documented detrimental impacts to public health and children's learning.

4. Communication of complex and unclear information that limited the community's understanding

Community members who did engage in the EIS consultation process were stymied by the poor quality and fragmented noise impact information that prevented an average reader from understanding the impact. Key data was frequently unclear, omitted, or framed in a misleading

way. This had the effect of concealing the total anticipated noise severity, particularly for non-technical audiences.

5. An incomplete analysis of viable airspace architecture alternatives

Alternative airspace designs that might have alleviated the noise impact were not presented to the community for consideration during the EIS process. Alternatives considered were limited to minor variations of the proposed design, despite it directly contravening most of the Airservices best practice airspace design principles (Figure 3).

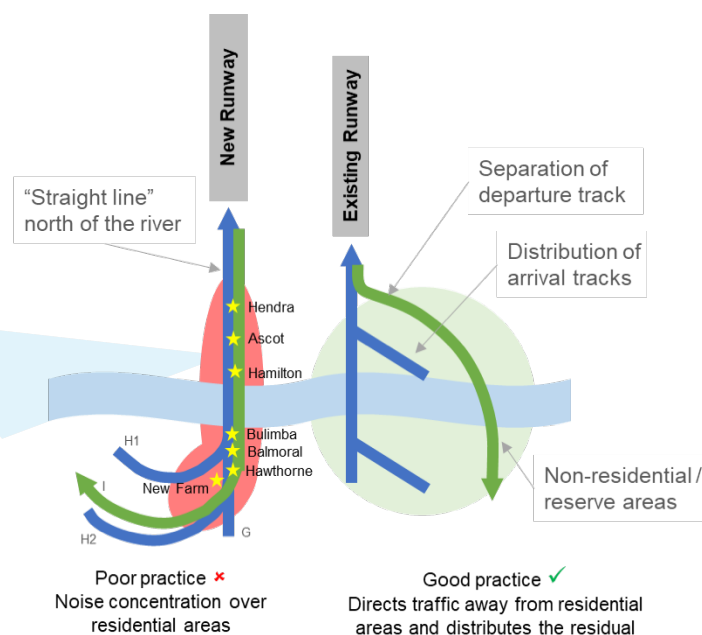


Figure 3: The concentrated airspace design of the new runway

Failed compliance with the stated EIS design principles:

- ✗ New flight paths or existing flight path changes to occur over water where possible, especially where aircraft are below 5,000 ft.
- ✗ Where it is not possible for new flight paths to be over water, flight paths to be concentrated over uninhabited areas where possible.
- ✗ If flight paths over residential areas are necessary, then residential areas overflowed by aircraft to be minimised to the extent practicable.
- ✗ Residential areas overflowed by departing aircraft should not to the extent practicable also be overflowed by arriving aircraft.
- ✗ Noise should be fairly shared whenever possible.

6. A failure to remedy the EIS consultation deficiencies prior to runway opening

Between 2007 and 2020 there were multiple opportunities to mitigate the deficiencies in the EIS and clearly communicate the full extent of expected noise impact. These efforts, however, failed to directly engage with highly impacted community members, improve the impact assessment methodology, or rectify the deficiencies in the quality of information presented. Mechanisms to inform prospective new community members about the noise impact during the development period were also inadequate.

7. The actual noise impact significantly exceeds EIS estimates

Emerging evidence now clearly demonstrates the EIS noise forecasts were fundamentally understated. This misled the community and undermined the impact and airspace design assessments. Actual N70 events are projected to be five times higher than EIS estimates at the

New Farm noise monitoring station, and double at Bulimba and Hamilton. Overnight utilisation of over-the-bay operating modes has also fallen significantly short of EIS estimates. Actual noise levels are expected to exceed EIS estimates by more than the 'significant impact' thresholds defined in the Airservices National Operating Standard AA-NOS-ENV-2.100.

8. Post-runway opening, mechanisms to address community concerns are inadequate

The community faces multiple barriers in accessing critical information and navigating the complaints process, with arcane institutional arrangements and disparate information resources. Critical noise forecast data remains either inaccurate or absent. The effect is to disempower the community through inadequate procedural fairness.

9. Brisbane is the host city for the airport infrastructure, and BFPCA considers the development has not earned a social license to operate.

A BFPCA **community survey**¹ of over 2,000 residents demonstrated the degree to which the community consultation process has failed. The outcome is a sense of disbelief, shock, and anger in the community at the extent of the failures by BAC and Airservices. The adverse impacts on people's health, well-being, employment, financial position, and personal relationships are profound and real. BAC and Airservices' treatment of these concerns as an unavoidable cost of the runway development represents a fundamental moral and ethical failure of governance.

Conclusion

The deficiencies outlined above have denied affected community members the opportunity to be fully informed with accurate and transparent information in order to assess the development. Had the community been properly consulted and fully understood the implications of an aviation super-highway over the most densely populated region of South-East Queensland, it is reasonable to conclude the EIS public engagement process would have produced a radically different outcome.

In summary, the integrity of the community consultation and airspace design process undertaken by Airservices and BAC should be considered fundamentally compromised. BFPCA asserts these failures represent a **trigger**² for a new environmental impact assessment and reassessment of the airspace design.

¹ <https://bfpca.org.au/community-survey/>

² https://www.infrastructure.gov.au/aviation/airport/planning/files/Significant_Impact_Guide_2012.pdf

Recommendation

The current airspace design maximises operational capacity and flexibility (well in excess of requirements) at the expense of community wellbeing – quite simply an unsustainable proposition for long-term co-existence between residents and the airport. Our assessment suggests only an airspace redesign and substantially improved operational noise abatement strategies can deliver an acceptable outcome for the affected communities. Any delay in progress towards this objective will continue to expose community members to an unreasonable and unjustified noise impact, and also risks legitimising the deeply flawed process to date amongst stakeholders.

BFPCA recommends:

Immediate commencement of a new environmental impact assessment and community consultation process by BAC and Airservices, including a reassessment of all available airspace architecture alternatives and noise abatement strategies to mitigate the unreasonable noise impact of the new runway.

BFPCA would welcome a community engagement process that meets the International Association of Public Participation's³ classification of "collaboration," where BAC and Airservices seek to "to partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution."

Unfortunately, many of the concerns identified within this submission are not new as the ANO is well aware,⁴ and many similar issues have arisen frequently over the past decades, namely in Sydney, Perth, Hobart, the Sunshine Coast, and the Gold Coast. BFPCA hopes that the ANO's investigation will prompt meaningful change in practices within the culture and processes of Airservices and BAC as it relates to transparent communications, community engagement, noise abatement, and environmental impact assessment.

³ <https://iap2.org.au>

⁴ <https://ano.gov.au/reportsstats/>