



Wednesday, 28 April 2021

Mr David Diamond  
Chair  
Brisbane Flight Path Community Alliance



**Sent via email: [contact@bfpca.org.au](mailto:contact@bfpca.org.au)**

Dear Mr Diamond

Thank you for your letter of 13 April 2021 on behalf of the Brisbane Flight Path Community Alliance (BFPCA).

I also acknowledge the correspondence that was sent to Brisbane Airport Corporation's Chairman David Peever and members of the Board, who have asked me to respond on behalf of the company.

I must emphasise that Brisbane Airport Corporation (BAC) recognises aircraft noise may be a burden for some people, and they deserve to know we will work with our partners (including airlines and Airservices Australia) to minimise this impact.

BAC acknowledges also that there are some for whom the new runways' flight paths are causing noise impacts while there are others, under the flight paths for the legacy runway, who are benefitting from less noise than they had previously experienced.

As the BFPCA recognises, Brisbane Airport (BNE) and aviation are integral to the social and economic life of the people of Brisbane, the city itself, and that BNE plays a key role in this regard for the broader state of Queensland.

The new runway at BNE has also given confidence for others to proceed with major projects in South East Queensland and the thousands of jobs these are creating now and into the future.

I have addressed below each of the specific issues and provided information which relates to the BFPCA call to action.

#### BFPCA Issues

- 1. BAC failed to achieve a social license to operate for the NPR and its flight paths due to its flawed and inadequate community engagement methodology. The methodology ignored the linear aspects of the new infrastructure (flight paths) and relied on indirect and low impact engagement tactics, which failed to adequately reach impacted residents outside a five-kilometre radius of the airport***

During the Environmental Impact Statement and Major Development Plan (EIS/MDP) process for the new runway, BAC undertook a comprehensive 22-month Public

Engagement Program (PEP) with the aim of engaging and informing the public about the project, going above and beyond legislative requirements wherever possible.

REACH surveys indicate that BAC connected with around 500,000 of an estimated 690,000 stakeholders within 20km of BNE, and an AC Neilson Omnibus survey indicated 68% reach across the Brisbane community of 1,400,000 residents.

The Public Comment Period for the draft EIS/MDP took place from 31 October 2006 to 2 February 2007. BAC actively engaged with the community for around 12 months before this (between September 2005 and September 2006), and these engagement activities were amplified during the formal public consultation period.

The Draft EIS/MDP was itself an important engagement tool, with BAC providing access to the document in various formats and locations to ensure members of the community had access to it. There were 322 hard copies distributed and the document was available on the Brisbane Airport website.

BAC also compiled and distributed 3,913 comprehensive information kits - consisting of CD-ROM copies of the draft EIS/MDP, a summary of major findings, a Flight Path and Noise Information Booklet, a Transparent Noise Information Package (TNIP), a 30-minute project DVD, 'how to make a formal submission' flyer and submission form, and a 'ways to obtain important information' flyer. The kits were distributed throughout the public comment period via mail-out, schools, shopping centres, information sessions, briefing sessions, and mail by request.

There were 22,709 visits to the project website during the 90-day public comment period, 220 information requests received via the online information request form, and 128 formal submissions lodged through the online form.

Members of the public were also able to request information via a dedicated email and telephone hotline. The Enquiry Email ([info@bacnpr.com.au](mailto:info@bacnpr.com.au)) received 324 emails during the public comment period. The Free Call Information Line (1800 737 075) was staffed Monday to Saturday for the duration of the public comment period, during which time 282 calls were received.

To raise awareness, BAC held a media conference on 31 October 2006 to officially launch the Draft EIS/MDP to the community for comment. Two media releases were also distributed to encourage community engagement, resulting in 135 media stories across print, radio and television. This was complemented by a comprehensive print media advertising campaign, with 110 ads placed across The Australian, The Courier Mail, Quest Community Newspapers, and The Redland Times during the 90-day period.

BAC also established a Community Information Centre at Boronia Road, Brisbane Airport, that opened Monday to Saturday for the duration of the public comment period where community members could ask questions, view information about the project and have access to all the documents and software so that they could give informed feedback. There were 161 visitors during the 90-day period.

Displays were also set-up in 19 shopping centres and libraries throughout Brisbane as a distribution point for Draft EIS/MDP Information Kits. The displays were also used to promote upcoming Information Sessions in suburban locations. Twelve Information Sessions were held (in Carindale, Boondall and Bardon).

In addition to 16 Fact Sheets distributed to the public before the public comment period, a fact sheet ("24-hour operation at Brisbane Airport") was produced and distributed via mail, email and posted on the project website. 2,237 copies were sent out.

BAC also utilised a comprehensive database to issue nine alerts related to the release of the Draft EIS/MDP, upcoming Community Information Sessions and, at the appropriate time, the pending end of the public comment period.

A series of briefings for elected representatives, industry and community groups, including Airport tenants, BAC staff, the Nudgee Beach community and Pinkenba community were also conducted. There were 14 Australian Government elected representatives, 10 State Government representatives, 9 Local Government Representatives, 7 community groups, and 10 business groups briefed and consulted with during the 90-day period.

Within the engagement period, there were 196 formal submissions received, 20 of which were in favour of the project and only two criticized the PEP which is unprecedented for a project of this size.

The community consultation program received various industry commendations at a state and national level, with the Federal Government acknowledging that the conduct of the PEP fully met their requirements.

## **2. It used significantly understated noise forecasts in community consultation and the EIS, which effectively concealed the full impact of the project**

For the EIS, BAC was required to use the Integrated Noise Model (INM) aircraft noise prediction program which is produced by the US Federal Aviation Administration and is the accepted noise modelling methodology used in Australia. This work was undertaken by Wilkinson and Murray and was published in full in the EIS/MDP.

Detailed information on the Noise Prediction Methodology can be found in Volume D Chapter 4 of the EIS/MDP.

The noise modelling is regularly reviewed and updated. In recent years this has included a review in 2018 when Airservices Australia finalised the airspace design and the *Brisbane's New Parallel Runway Airspace Design: Noise Footprint Comparison to the 2007 Environmental Impact Statement (May 2018)* was provided to the Commonwealth. At this time, Airservices Australia endorsed the information used to determine the noise contours based on modelling that reflected final airspace design, expected aircraft fleet mix, and how Air Traffic Control would operate the flight paths.

Furthermore, BAC updated the N70 contours for the legacy runway after Airservices Australia provided BAC with actual noise monitor data from the Noise Abatement Departure Procedure trial conducted by both parties in 2019. During the trial a number of temporary noise monitors were positioned along the departure flight path for the legacy runway enabling us access to more detailed data.

From the time of the EIS/MDP until the opening of the new runway and beyond, BAC has been transparent with the information regarding the noise the modelling suggested would be likely to be experienced. BAC used several different ways to communicate this, including comparisons to other well-known Brisbane sound levels, noise mapping and contours including 20-year forecasts, a Transparent Noise Information Package (TNIP), a dedicated section within the BAC online Flight Path Tool, the Flight Path and Noise Information Booklet, as well as encouraging community members to visit suburbs with current noise exposure comparable to what could be expected under the new flight paths.

**3. The process insufficiently assessed the adverse health and welfare impacts on affected communities caused by the airspace design, and failed to properly consider how these impacts could be mitigated**

BAC has always been transparent about the impacts aircraft noise and flight paths can have on the community.

Social Impact Assessments were undertaken as part of the EIS with the Federal Government acknowledging they were addressed and met their requirements.

This work was undertaken by relevant experts and their findings did inform the final design of the flight paths.

The Social Impact Assessment relating to Airspace can be found in Volume D, Chapter D9 of the EIS/MDP.

**4. Critical key noise information regarding over the bay operations, flight frequencies, noise contours, and flight path locations were communicated in a misleading and complex manner that further limited the community's understanding**

BAC has always been very clear that the operation of the new runway would mean new flight paths and that some communities would receive new noise while other communities would experience a reduction in noise events. There has never been an attempt to mislead the community regarding the impacts of the new flight paths.

As detailed earlier in this letter, during the EIS/MDP, BAC delivered an all-encompassing integrated community engagement program which used a variety of different tools and methods. This continued following the project's approval in 2007, where BAC delivered an extensive community update program which exceeded what was required through the approvals.

To highlight some of this activity, this program included 54 community 'information exchanges' and fora, more than 65,000 individuals visiting our on-site discovery centre, and later, a mobile information centre, 138 community presentations, more than 158,000 visitors to the online flight path tool since 2018, 68 email newsletters sent to on average 300,000 BNE newsletter subscribers, 85 educational videos, 27 letterbox drops, 42 advertisements in community newspapers, 175 billboards and 1,066 radio advertisements,

From 2018, quarterly market research surveys were conducted by Enhance Research to allow BAC to track the reach of its engagement. The results indicated an overall increase in awareness of Brisbane's new runway within the surrounding communities throughout the duration of the community engagement program. Just prior to opening, BNE recorded 71 per cent awareness of the runway project, and of those, 82% awareness that the new runway would bring new flight paths.

An important part of the education program was local media reportage on the runway project. For seven years BAC placed a fortnightly feature in relevant Quest community newspapers and the Courier Mail provided comprehensive coverage of the new runway progress including a multi-page feature illustrating the flight paths.

Describing airspace and aircraft noise is complex and challenging, however it is my belief that BAC went above and beyond in providing information to the community in a clear and easy to understand manner, whilst maintaining accurate detail and essential technical information.

- 5. BAC omitted to present any viable airspace design alternatives with significantly different noise profiles for the community to consider and challenge. The over-riding objective of BAC appeared to be the maximisation of operational capacity and flexibility without regard to alternatives that might reduce impact on the community.**

The flight paths for the new runway system were designed by Airservices Australia, in consultation with BAC, and approved by CASA. Alternative airspace design options were presented in the EIS/MDP in Volume D Chapter 3.

While BAC worked closely with Airservices to minimise community noise impacts, there were constraints to the design of the airspace based on the location of the runway (which was confirmed as part of master plans dating back to the 1970s), regulatory requirements to ensure aircraft access to other airports, international regulatory standards for flight path design, separation requirements for air traffic control including break out procedures, federal government requirements to use existing flight corridors as much as possible, while balancing the need for an airport which can support the growth of the city and region.

Extensive time and collaboration went into the design of the new flight paths, with many iterations developed taking into account safety, efficiency, reliability of operations and the minimisation of environmental and noise impacts for the community. The flight paths were peer reviewed by experts from around the world to confirm they were the best possible outcome. The peer reviews confirmed that the EIS/MDP commitment to maximise over the bay operations, particularly at night, and to ensure no flights over the city between 10pm and 6am provided the best noise outcomes for the community.

#### BFPCA call to action

BAC understands and respects its responsibility to the community and our partners. Any decision regarding a new EIS or a review of the operations at Brisbane Airport, is for the Federal Government and Airservices Australia. Prior to opening the new runway, Airservices Australia assessed the airspace design and noise modelling against the National Operating Standard AA-NOS-ENV-2.100 as part of their endorsement of the environmental assessment report, - *Brisbane's New Parallel Runway Airspace Design: Noise Footprint Comparison to the 2007 Environmental Impact Statement (May 2018)*. This document and endorsement was submitted to the Commonwealth as part of the finalisation of the Airspace Design.

- 1. Correction and re-issue of the misleading and inaccurate noise forecasts and community impact assessments provided during the EIS**

As detailed earlier in this letter, the published noise forecasts for the new runway were based on widely accepted modelling methodology.

Since the runway has opened, BAC has been monitoring how actual operations compare against the modelled estimates. The average noise level in the impacted areas is largely consistent with what was modelled in the EIS/MDP and subsequent communications, but, as with any model, variations are not unexpected.

At this stage, we cannot draw definitive conclusions on the data due to the small sample size (less than a full year of operations and limited seasonal variations) and the impact that COVID has had on Brisbane Airport's operations.

Now that the runway is open and actual noise data is also available, members of the community are directed to Airservices Australia and their 'Aircraft in Your Neighbourhood' website.

As part of every master plan, the noise forecasts and modelling for Brisbane Airport is examined and provided based on a 20-year outlook and the airport's ultimate capacity. The next master plan is scheduled for 2024 and this process will be repeated at that time.

**2. Urgent development and implementation of a noise improvement plan, which clearly sets out the short and long- term changes to the airspace architecture and noise abatement strategies that BAC and Airservices are proposing, with a clear quantification of the expected improvement that align with the expectations of 'minimal impact' to Brisbane residents that BAC has consistently promised over a number of years and in documentation that residents have relied upon in personal decision making.**

BAC is committed to continuous improvement to noise mitigation for the greater community, with safety always being the first priority.

Together with Airservices Australia and our airline partners, we have developed and implemented noise abatement programs and will continue to work with the community and industry in investigating possible further initiatives. This work is detailed on the Noise Management page of the Brisbane Airport website and, to date, some additional initiatives have included:

- A 2019 trial of noise abatement procedures which resulted in aircraft higher on departure and additional noise abatement procedures.
- A Technical Airspace Design Workshop held on 24 February 2021 with representatives from BAC, Airservices Australia, Virgin Australia, the Aircraft Noise Ombudsman, BACACG and the BFPCA. This workshop was initiated by the BFPCA (further detail below).
- Based on community feedback, and at the request of BAC, Airservices has agreed to commence over the bay operations on the new runway earlier than the required 10pm and remain in that operational mode longer when the winds allow. Since opening, 53% of all Brisbane Airport operations have occurred over the bay.
- A submission to CASA to return the tailwind limit from 5 knots to 10 knots, which – if approved– would, incrementally increase the frequency of over the bay operations at night.
- Commissioning of a temporary noise monitor which will commence in July and will be placed in Balmoral, Samford, Upper Brookfield and Northgate over the course of the next 12 months.

Further, Airservices Australia has announced that it will conduct a Post Implementation Review (PIR) of the flight paths and airspace changes implemented to support parallel operations, and the associated aircraft noise impacts. BAC supports this announcement and will assist wherever needed.

As mentioned above, BAC hosted a Technical Airspace Design Workshop in early 2021 in response to a suggestion from the BFPCA. The outcomes of this workshop include:

- A commitment to maximising over-the-bay operations when possible;
- Investigation of alternative airspace design solutions which will now form an important part of the PIR; and

- An audit of operations including height of aircraft on arrival and frequency of movements.

**3. Direct engagement by BAC with all severely impacted residents to the best practice standards typically employed by all levels of Australian government for major projects (i.e community members under the new flightpaths), to accurately communicate the expected impact of the NPR on the community and to consult on the noise reduction plan**

BAC has continued to deliver its direct community engagement program with Brisbane residents since the opening of the new runway. This has included our mobile information centre visiting Bulimba twice, New Farm, Samford, Chermside, Carindale and Hamilton, community presentations, responding to more than 2,700 submissions through our feedback channels and, critically, personal briefings with concerned residents.

Since the formation of BFPCA, BAC has ensured your organisation has been informed and engaged in these actions including participation at the Brisbane Airport Community Aviation Consultation Group (BACACG) and the Technical Airspace Design Workshop.

Importantly, the PIR will also involve direct engagement with community members and industry impacted by the operations at Brisbane Airport.

**4. BFPCA requests that a community engagement process is embraced by BAC that meets the International Association of Public Participation's (IAP2) 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".**

BAC has collaborated with government, industry and the community in all appropriate areas of the project. While the ultimate decision regarding airspace design is made by Airservices (and approved by CASA), the community was provided the opportunity to provide feedback and both BAC and Airservices have worked with the community to identify and implement improvements wherever practicable, for example, working with the BFPCA at the Technical Airspace Design Workshop. This collaboration with the community and the BFPCA will continue with the BACACG playing an important role.

BAC acknowledges the length of time between the formal community consultation process, approval of the EIS, construction commencing and opening of the new runway. Therefore, BAC took the view that it was imperative the community had easy access to accurate information regarding the project's status and was afforded the opportunity to continue to provide feedback.

The new runway and the new flight paths were important features in the 2009, 2014 and 2020 Brisbane Airport Masterplans. These documents also included dedicated public comment periods and this feedback was reported to the Government.

In addition, in 2012 the Commonwealth conducted a review of Brisbane Airport's 24-hour status and the community was invited to make submissions in relation to aircraft noise impacts during that process.

BAC will always look to international best practice when it comes to the operations at Brisbane Airport, not just in terms of safety and efficiency, but also having regard to community impacts and engagement.

We look forward to keeping you and the BFPCA updated and informed on the progress of current actions as outlined and will continue to work collaboratively, and with transparency, with the community and industry stakeholders.

Yours sincerely



Gert-Jan de Graaff  
**Chief Executive Officer**