



BRISBANE FLIGHT PATH COMMUNITY ALLIANCE

**Brisbane Airport Flight Path Changes Post-Implementation Review (PIR):
Feedback on PIR Draft Terms of Reference**

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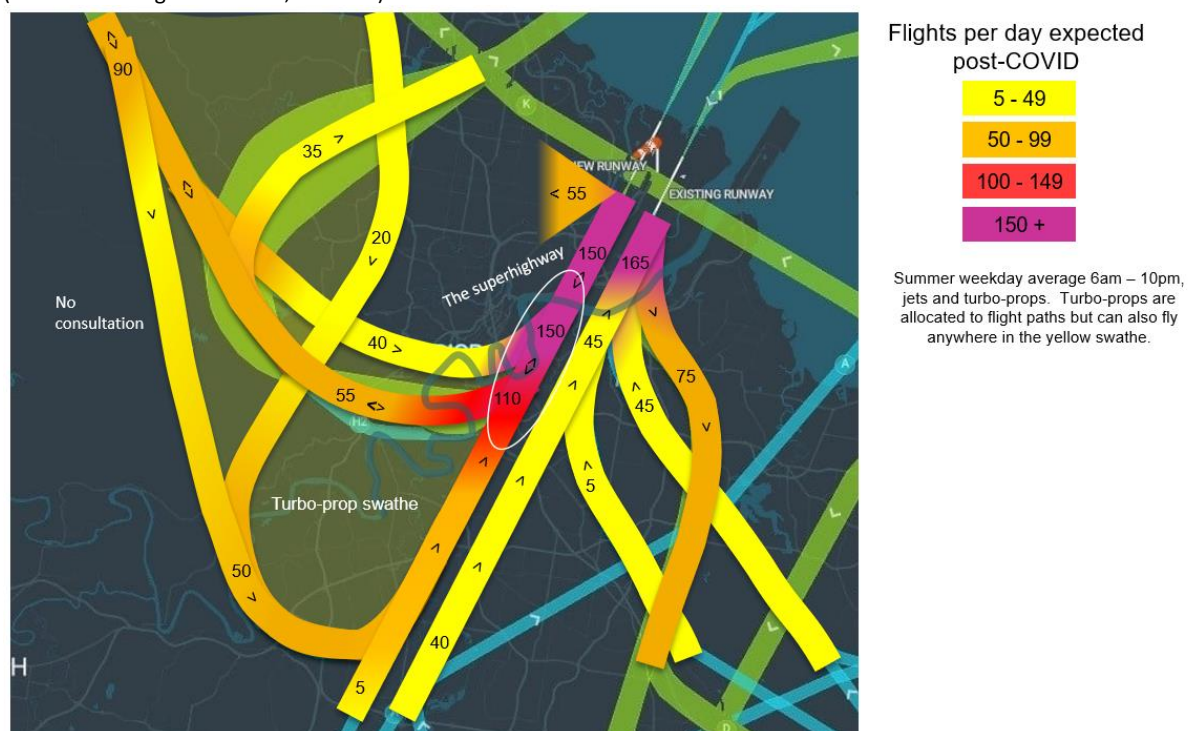
Background

Brisbane Airport's new runway has created one of the nation's busiest air traffic corridors over the most densely populated region of South-East Queensland. A punitive and highly concentrated flight path design has been inflicted on local communities without due process and affected residents have been forced to bear an impact at levels known to cause long-term harm to human health and well-being.

Forecasts of the impact on communities from the new runway have been systematically understated at every stage of the development. Large populations and vast areas of Brisbane's south and west are now exposed to high levels of chronic aircraft noise despite forecasts of low impact, or in many cases, no impact at all. In areas closer to the centre of Brisbane – under the 'super-highway' – the noise forecasts provided by Airservices Australia (**Airservices**) and Brisbane Airport Corporation (**BAC**) have proven to be highly deceptive and misleading. The severity of the noise impact on affected residents was effectively concealed and promoted as 'noise-sharing,' when instead the flight path design simply shifted a severe impact. The new runway has also failed to reduce overnight noise to the levels promised, and communities remain exposed to unacceptable night-time noise levels.

Figure 1: Brisbane aircraft traffic forecasts over affected suburbs

(source: BAC Flight Path Tool, BACACG)



The flawed consultation process has permitted Airservices to deliver an unbalanced outcome that prioritises BAC's commercial objectives ahead of community impact, without proper critical review or adequate community participation in the airspace design. Checks and balances to ensure an equitable and sustainable outcome for all stakeholders have been bypassed, and international best practice designs with lower impact have been ignored. Affected residents consider this to be negligent, unethical and highly unfair.

Post Implementation Review

The Post Implementation Review (PIR) has been presented by Airservices and the responsible Minister as an opportunity to review the implementation process, and to identify improvements to the airspace design. Unfortunately, the proposed scope of the PIR will almost certainly produce an outcome **without any meaningful improvement**.

Airservices are effectively “marking their own homework,” and the organisation lacks the necessary independence to complete an effective review. It is evident that Airservices has been unable to deliver a fair and transparent process for the community to date, and BFPCA does not have the confidence that Airservices is capable in doing so in the PIR. Independent leadership of the PIR is imperative to deliver an impartial and unbiased review.

The proposed process to develop improvements and solutions is equally of concern. The current airspace design is operationally inefficient, does not meet the normal safety assurance principles, and ignores most of Airservices’ own best practice design principles that were in place during the airspace design phase. The proposed reliance on the community to suggest solutions to these issues in a highly complex network of flight paths appears to be an exercise designed to avoid Airservices fulfilling its core mandate. Airservices should instead lead the development of alternatives, supported by an independent technical advisory group to better inform all stakeholders about the range of alternatives possible.

The proposed exclusion of the 2007 Environmental Impact Statement (EIS) and the high-level route structure from the scope of the PIR is also a critical omission. Exclusion of these will prevent the PIR from identifying the issues of most concern to the community, and limit the design flexibility needed to resolve the concerns in the most effective way.

BFPCA Proposed Amendments to the PIR Terms of Reference

Brisbane Flight Path Community Alliance (BFPCA) proposes the following critical amendments to the PIR Terms of Reference (ToR). The reference to sections in each proposal corresponds with the sections in the PIR.

- 1. The PIR should be independently led.** BFPCA requests an independently-led PIR process as Airservices is inherently conflicted in conducting a review of its own implementation performance and design outcomes. Options include the Department of Infrastructure, Transport, Regional Development and Communications or another independent agency. Airservices should be willing to adopt best practice governance in the form of independent PIR leadership if it is genuinely committed to rectifying past performance failures. *[All sections]*
- 2. An independent technical advisory group should be appointed and funded by the Department of Infrastructure, Transport, Regional Development and Communications.** BFPCA recommends appointment of an independent technical advisory group to assist Airservices in generating and developing alternatives, and to rectify the information asymmetry between Airservices and the community on technical matters. This body should be tasked with supporting Airservices to generate and develop alternatives, and should also critically review airspace alternatives and Noise Abatement Procedures (NAPs) proposed by Airservices with a focus on

minimising community impact. It should provide its independent assessments and feedback to all stakeholders. A modern organisation with a just safety culture would support this in the interests of improving the system. A number of commercial service providers exist to perform this function, for example Airbus Nav-Blue, eNAV, or To70. It would be preferred not to use prior consultants in order to bring new thinking to the problem. *[All sections]*

3. **The scope must include the 2007 EIS.** The impacts and consequences of the failures in process now being inflicted upon residents originated in the 2007 EIS. The proposed exclusion of the 2007 EIS from the PIR scope is inexplicable and unacceptable. Without a review of performance against the original approved baseline, the PIR will ignore the issues of greatest concern to the community, and its exclusion risks flawed review conclusions and the development of flawed solutions. For this reason, the PIR must include the 2007 EIS. *[Sections 6.1, 6.2]*
4. **The scope must include the high-level route structure.** The exclusion of the high-level route structure will also significantly limit the flexibility to resolve many of the current airspace design issues. Implementation of a best practice design is likely to require realignment of the high-level route structure approaching and departing Brisbane. A flexible, national route structure could enable not only better impacts for the community, but also address the currently very high number of aircraft cross overs which reduce operational efficiency. The concurrent Western Sydney Airport airspace design offers an opportunity to update the east coast high-level route structure for better outcomes across the nation. *[Sections 6.1, 6.2]*
5. **Airservices (in conjunction with a technical advisor) must lead the development of airspace design alternatives and noise abatement procedures (NAPs).** The PIR should not exclusively rely on the community's suggestions for alternatives to improve outcomes. Airservices should instead implement a structured process whereby it develops alternatives to resolve the concerns and issues identified and discusses these with affected communities. Airservices should not be constrained by the 2007 EIS airspace design and should have a particular focus on resolving residents' concerns including a lack of due process from the 2007 EIS onwards. *[Sections 3, 4, 6, 8]*
6. **The ToR should define the level of community engagement the PIR is seeking to achieve.** Airservices has not provided any detailed or comprehensive commitments to ensure proper processes are followed to avoid a repeat of its past performance. The ToR fails to articulate how transparency, independence, objectivity and integrity will be embedded in the process. The International Association of Public Participation (IAP2) is the leading community engagement peak body internationally and in Australia – its principles are used by all levels of Australian government when providing community engagement. The targeted level of community engagement on IAP2 spectrum should be defined (not just an aspiration for a level “that affords the greatest influence”), and the processes to achieve the targeted level should be established in the ToR. *[Section 7]*

7. **The scope of the PIR should not be limited to noise impacts.** The PIR should include all aspects of the definition of Environment. Note that Airservices' own Flight Path Design Principles¹ contain the following statement in relation to assessing environmental issues: *"The EIA [Environmental Impact Assessment] assesses flight path changes across four categories: aircraft noise, fuel burn and emissions, biodiversity and other EPBC Act matters (such as potentially affected noise sensitive sites and communities)."* (page 24). Of particular concern to the community is potential contamination of tank drinking water that has not been assessed. [Sections 1, 3, 4]
8. **The review of community engagement and community impact should be against both the 2007 EIS and the final design's environmental impact.** It is critical that the performance review uses the 2007 EIS as the primary baseline in all aspects of the PIR. The proposed use of only the final design environmental assessment is flawed and will result in issues of significant concern to the community being ignored. [Sections 3, 4, 6]
9. **The review of community engagement should include the role and performance of BAC.** Airservices effectively sub-contracted its core obligations regarding community consultation to a privately-owned for-profit corporation without adequate governance, transparency or controls. The performance of the interface between Airservices and BAC, and the role and performance of BAC itself in community consultation must be included in the ToR scope. [Sections 3, 4, 6]
10. **The decision-making process to assess alternatives is inadequate and requires a better framework.** A reliance on the vague and subjective 2020 Flight Path Design Principles (FPDP) without definition of the acceptable level of trade-off between competing principles is a deeply flawed approach. Without any objective criteria there is no transparency over the decision process or outcomes. BFPCA accepts a priority on air safety, but without clear process this priority can often be used to stop appropriate option analysis or searching for better alternatives. For example, the level of risk that safety will be deemed to be compromised is not defined. Equally, the acceptable level of impact on operational efficiency for improved noise outcomes is not defined. How will a severe, negative impact on hundreds of thousands of residents versus a small group of for-profit service companies be assessed? Comparing a financial impact to a community impact is an "apples to oranges" comparison. There must be more objective principles and assessment criteria developed.

The ToR should therefore include a process for Airservices to develop a better decision framework for the PIR. This decision framework should be developed in consultation with the community and other stakeholders and be used by Airservices in developing alternatives and assessing their impacts. [Sections 3, 4, 6]

11. **The noise sharing objective and decision criteria should be better defined.** The ToR has an objective to "seek opportunities to enhance noise sharing across both runways

¹ <https://www.airservicesaustralia.com/wp-content/uploads/Airservices-Flight-Path-Design-Principles.pdf>

and among the various flight paths for each.” The principle of noise sharing has been adopted by Airservices in other locations in order to limit exposure to very high levels of aircraft noise, and ensure a fair and equitable distribution of the impact. For example, the **Sydney Airport Long Term Operating Plan (LTOP)** explicitly targets noise sharing as its primary objective. The ToR should define a process to determine if this will be a primary objective for Brisbane. It should also define how Airservices intends to assess the magnitude of any imbalance both now and post-COVID. A true noise sharing approach to Brisbane airport will likely require changes to the national route structure, reinforcing the need to include the high-level route structure in the PIR scope. *[Section 4 point 9]*

- 12. The objectives should include development of a Long Term Operating Plan.** A long term operating plan should be developed during the PIR to better manage, mitigate and abate the aircraft noise associated with Brisbane Airport and its flight paths. *[Section 4]*
- 13. The review process for over-the-bay (OTB) operations must include assessment against the 2007 EIS.** The 2007 EIS (and much of the community consultation material since that time) focused on over the bay (OTB) operations being the preferred daytime mode of operation. Consultation material also promoted the ability of the new runway to increase overnight OTB utilisation to ~90%. However, in the final approved airspace design, Airservices and BAC covertly removed OTB as the preferred daytime operating mode without community consultation. Additionally, since runway opening, it is now clear that overnight OTB utilisation has not reached the 90% target, and there is no pathway identified for achieving the target. Airservices must review the way and reasons in which OTB operations were removed as the preferred daytime mode of operation, and also the overnight performance levels against the EIS targets. *[Sections 3, 4, 6]*
- 14. The review of performance against the baseline should identify the root causes of any flight path or noise deviations.** The final flight path design has significant deviations from the nominal flight path tracks communicated in community engagement material during the 2007 EIS process. As part of the review into noise levels against forecasts, all geographical variances between flight path corridors in the 2007 EIS and the final design should be clearly identified and communicated to the community. The level of noise impact is also significantly different from the impact assessments provided to the community in the 2007 EIS and the final flight path design process. The magnitude and the root causes of these significant deviations should be clearly identified and addressed. *[Sections 3, 4, 6]*
- 15. Airservices should advise the community of any changes which *could* deliver substantial improvement in community impact, but for which Airservices are not the arbiter.** This includes changes to Amberly airspace, or airport hours of operation in order to minimise the negative impact of noise associated with use of flight paths as designed by Airservices. Where the responsibility for dealing with, or responding to, some of the negative environmental and social impacts is demonstrated and involves other entities, Airservices must commit to identifying these parties and use its best



endeavours to bring them to the table as part of the PIR, in order to collaboratively resolve or mitigate unnecessary impacts. This recommendation is consistent with the 7th Principle listed in Section 7 of the draft ToR – “Information that Airservices can provide on operations outside of its remit that may support community understanding or discussions with relevant agencies will be provided where available.” [Section 6.2]

- 16. The community should be given the opportunity to provide further feedback on the draft ToR once the ANO investigation outcomes are released.** Community members and groups (including BFPCA) must be provided with the opportunity to consider the ANO’s investigation outcomes and provide further feedback on the PIR ToR before it is finalised. [Sections 6.3]
- 17. The scope of Phase 1 should be expanded to include assessment of post-COVID operations.** The distinction between Phase 1 and Phase 2 is likely to unacceptably delay the implementation of any substantial changes to post-COVID operations. As there is no certainty on when air traffic will return to pre-COVID levels, it is possible that the proposed PIR schedule could result in a multi-year delay to assessing the post-COVID impacts. The PIR process must be amended to assess post-COVID conditions in Phase 1 using the best available air traffic forecasts and noise modelling. We also request the use of actual 2019 air traffic mapped to the current flightpaths, and modelled with the AEDT tool to estimate post-COVID conditions in Phase 1. [Section 6.3]
- 18. Airservices’ National Operating Standards (NOS) and prior assessments against these standards should be released to the public.** It is essential that the NOS and the assessments against it and the Environment Protection and Conservation Act (EPBC Act 1999) during the 2007 EIS and final design are made publicly available. [Section 5.3]
- 19. Airservices must provide the opportunity for face-to-face community consultation.** In addition to the electronic dissemination of information (factsheets, WebEx sessions, presentations, Frequently Asked Questions, etc.), Airservices should provide opportunities for public gatherings in as many affected locations as possible for the community to liaise directly with Airservices. [Section 5.3]
- 20. Airservices should appoint dedicated community interface personnel who will liaise with the community during the PIR.** This liaison role must be easily accessible to the community by phone, email and face-to-face meetings and be responsible for dealing with requests for information, questions, and take ownership for all communication from initial request through to resolution. [Section 5.3]
- 21. BACACG should be included as a specific stakeholder group.** The Brisbane Airport Community Aviation Consultation Group (**BACACG**) should be included as a specific stakeholder group to be consulted and informed as it is one of the few stakeholders that has dedicated community representation. [Section 10]

22. BFPCA should be included as a specific stakeholder group. As an organisation representing the interests of affected community members, BFPCA seeks to be included as a stakeholder to be consulted and informed in the PIR process. *[Section 10]*

23. Airservices should create a mechanism to submit anonymous feedback to the PIR. BFPCA is aware of the existence of stakeholder groups with industry knowledge and expertise that seek to remain anonymous but want to voice their opinion and advice. Airservices should put in place a mechanism to allow anonymous feedback. This is in the interest of all parties to ensure a robust review and assessment of the process. *[Section 5.3]*

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