



BRISBANE FLIGHT PATH COMMUNITY ALLIANCE

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

17 November 2022

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BFPCA Response to draft PIR Report Recommendations

Please find our response to the recommendations contained in the **Airservices Draft PIR Report released on 21/10/2022**.

Package 1

Package 1 – Strong, transparent and representative governance

- **Recommendation 1.1 – Oversight, Management and Assurance program:** *Airservices will support government and other stakeholders in the establishment of oversight, management and coordination functions to support flight path change delivery, as well as development of assessment frameworks and independent assurance mechanisms.*
- **Recommendation 1.2 – Industry-wide communications planning:** *Airservices will work with industry stakeholders, government and community to develop effective communications plans supported by all relevant organisations and agencies, to ensure that information provided is consistent, clear and transparent.*
- **Recommendation 1.3 – Meaningful engagement process:** *Airservices will work with government, community and industry stakeholders to develop effective community engagement plans and tools, to ensure communities are adequately engaged, have the opportunity to input to decision-making and that the metrics used to make decisions are understood and transparently reported against.*
- **Recommendation 1.4 – Long-term Noise Action Plan:** *Airservices proposes the recommendations in this report form the initial version of the Noise Action Plan. This plan will implement noise mitigation measures which are well-planned, tracked, reported against, and supported by community and industry stakeholder involvement.*

BFPCA Response: We **do support** Package 1. Establishing “a strong, independent, permanent, and fully funded Brisbane Airport Community Forum” with proper community representation was a Labor Party election promise. The establishment of the Forum must be actioned as a priority and without delay.

BFPCA Response: Airservices has repeatedly demonstrated a lack of technical expertise and know-how to lead any flight path re-design work, and an inability to establish a constructive working relationship with the Brisbane community. As a result, **we also demand** that the Department of Infrastructure and Transport provide direct oversight in close collaboration with the Brisbane Airport Community Forum to ensure these recommendations are actioned as stated and in a timely manner.



Package 2

Package 2 – Maximise flights over the water

- **Recommendation 2.1 - ATC Operating Plan to extend the use of SODPROPS:** *Airservices will develop an Air Traffic Control (ATC) Operating Plan, examine options to extend the use of SODPROPS and implement associated design enhancements.*
- **Recommendation 2.2 - Reduce ATC workload and complexity associated with SODPROPS:** *Airservices will engage with Defence in relation to Amberley airspace, ATC procedures and specific flight paths that constrain SODPROPS operations.*
- **Recommendation 2.3 - Modify specific SODPROPS flight paths and ATC procedures:** *Airservices will review options to reduce track miles and emissions associated with SODPROPS operations, update ATC procedures to optimise final approach efficiency and review options to reduce the impact of over water operations on affected communities*

BFPCA Response: We **do support** Recommendation 2.1. The use of SODPROPS must be coupled with a binding ATC operating plan including solid performance requirements, clearly defined metrics and KPIs that clearly prioritise safety and noise minimisation over efficiencies and airport profits. SODPROPS must be reinstated as the number 1 priority mode 24/7. This only requires a local instruction from Airservices with 14 days notice and we expect this to be actioned before the end of this year.

Additionally, BFPCA notes that Airservices is behind in implementing international standards with regards to the runway conditions that enable the safe operation of SODPROPS. ICAO now uses a more complex measurement of when the runway is contaminated and slippery, yet Airservices appears not to have fully implemented this yet. These delays further prevent SODPROPS from being in use to protect Brisbane communities from excessive noise pollution. We refer to the below revised Noise Abatement Procedures, including a demand to fully adopt the new ICAO Global Reporting Format (GRF) for runway surface conditions.

Furthermore, Airservices seems to take the view that SODPROPS is limited by environmental factors and capacity constraints. BFPCA suggests that it is the number of flight movements that should be limited by the ability to safely use SODPROPS. That is how this project was sold to the community by Brisbane Airport and Airservices.

BFPCA Response: We **do support** Recommendations 2.2 and 2.3. However, given AirServices has demonstrated a lack of technical competence needed to both design flight paths and to engage constructively and meaningfully with the Brisbane community, we demand that any **redesign of flight paths be undertaken by an independent, well resourced third-party experienced in world best practice flight path design such as NavBlue, ENAV, etc. – following an open and competitive tender process via the Commonwealth Government’s AusTender platform.**



With regards to Recommendation 2.2, BFPCA believes it is not a given Defence will easily give up their airspace or flexibility in return for noise abatement. We flag the prospect of Airservices using Defence's refusal as an excuse not to progress this recommendation as a major concern.

Similarly, with regards to Recommendation 2.3, BFPCA flags the prospect of Airservices using emissions as an excuse to not increase SODPROPS use as a major concern for us. If Airservices is really concerned about emissions and climate change, we suggest moving away from the unsustainable neoclassical growth strategy and instead implement a net reduction in flights as was championed this year by the Dutch Government for Schiphol's Amsterdam Airport.¹

Package 3

Package 3 – Reduce the frequency and concentration of flights over communities

- **Recommendation 3.1 – Reduce the frequency and concentration of flights over communities:** *Airservices will develop options for departure and arrival paths over the city to allow for noisesharing and to reduce the occurrence of communities being subject to both arrival and departure operations. Airservices will also develop options to reduce the impact on communities of non-jet tactical operations, flight paths further from the airport, merge points and hold downs. In addition, Airservices will introduce opportunities for greater use of advanced navigation technology where this improves community noise outcomes.*

BFPCA Response: We **do not support** Package 3 to the extent that it entertains noise sharing as a mitigation for excessive aircraft noise.

BFPCA Response: We **do support** the disassembling of flight paths that subject communities to both arrivals and departures. It should be a priority design principle, when combined with other noise mitigation measures such as caps and curfews, and a Long Term Operating Plan.

We note and **support** item 'm' in Recommendation 3.1: "Redesign STARs and merge arrivals further north to reduce overflight of suburbs to the north and north-west of the airport." While this will not help communities in inner-city suburbs, BFPCA believes this needs to be prioritised to allow aircraft to be higher on arrival, which will benefit communities living in outer suburbs.

BFPCA Response: We **do support** the measures **other than noise sharing** listed in Package 3 including moving away from compass mode runway options. These must not be done in a piecemeal fashion. We therefore also require that these measures be incorporated within an overall redesign strategy which must consider airways, terminal area and integration of military and civil airspace, and developed by an independent well resourced third-party experienced in flight path design.

¹ Schiphol airport Amsterdam, the third busiest in Europe, will be required to limit traffic to below its pre-pandemic peak, to reduce pollution, 27/06/2022:

<https://www.climatechangenews.com/2022/06/27/dutch-government-issues-world-first-cap-on-flights-from-european-hub/>



Package 4

Package 4 – Optimize the performance of the wider Brisbane airspace system

- **Recommendation 4.1 – Introduce noise sharing through new operating modes:** *Airservices will develop options to connect flight paths to all runway ends to provide greater flexibility for noise sharing, and investigate a range of modes, including segregated and semi-mixed modes, to provide periods of respite for communities.*
- **Recommendation 4.2 – Introduce multiple arrival routes over the city:** *Airservices will develop options for multiple arrival routes which can be alternated on a planned schedule to provide respite to communities. This will be completed in parallel with an already planned IT system upgrade.*

BFPCA Response: We do not support Package 4 as written. In principle, we are not supportive of noise sharing as the primary solution without first implementing genuine net reduction measures. However, after the successful implementation of capacity caps and curfew we would re-consider the introduction of multiple arrival routes over the city to distribute further excessive noise from aircraft more evenly across the city on a permanent basis. We do not support the alternating flights on a planned schedule as this will continue to result in days of intense excessive noise in particular suburbs within the city.

Additional Demands Pertaining to the PIR Report

The draft report fails to adequately deal with the core problem of excessive noise pollution from aircraft traffic over residential Brisbane. Consequently we are only able to support a few recommendations and measures. Additionally, we note the following issues:

The number of flights experienced by residents within relevant suburbs significantly exceeds the daily flight numbers specified in the EIS. **We therefore demand** that Airservices report daily flight numbers in excess of EIS totals.

The draft PIR report does not include quantification of the anticipated positive benefits of the measures outlined in the report. This means that measures in the report can not be compared for efficacy. **We therefore demand** that all currently proposed and any future proposed aircraft noise mitigation measures include an anticipated measure of associated noise level reduction and/or flight number reduction.

The draft PIR report makes no mention of the anticipated increase in flight numbers associated with the recently announced third airport terminal. Given that BAC and Airservices must know the anticipated numbers of flights associated with the establishment of a third terminal in order to plan and design the terminal, **we demand** that the increased flight numbers be published to the community, and included in any assessment of the effectiveness of the measures in the draft PIR report. Furthermore **we demand that** Airservices publish an accurate airspace flight numbers map with the current status and the five year projections out until 2035.

Net Reductions Needed

Despite the recommendations proposed in the TRAX report and in this Airservices draft PIR report, BFPCA is very concerned that any small relief will be soon overtaken by the expansionist growth plans of Brisbane Airport Corporation aiming to increase demand to fully utilise their entirely unrestricted capacity of 110 flights an hour. BFPCA notes that across the voluminous and verbose 363 pages of the draft PIR report, **neither Airservices nor Brisbane Airport have proposed ANY of their own compromises or sacrifices** to the airport's 110 flights an hour capacity. So far, the airport is not being asked to make any net reductions to accommodate the liveability, health, wellbeing, as well as economic productivity of Brisbane residents and communities trying to live, work, learn, and sleep across 169 suburbs of Brisbane affected by severe noise pollution.

Collusion between Airservices and Brisbane Airport

As evidence of the collusion between Airservices and Brisbane Airport Corporation, we put on the public record in the appendix to our submission the "Key Messages" document Airservices produced in February 2022 for their airline and airport industry stakeholders released on their ENGAGE portal in the context of the proposal to increase the allowable tailwind at Brisbane Airport. It says:

"To enable long-term growth at Brisbane Airport (BNE), Brisbane Airport Corporation Pty Ltd (BAC) must maintain the ability to operate with minimal operational constraints."

"The future profitability of Australia's major airlines will in part depend on BAC's ability to keep the parallel runway system unconstrained as movements along the east coast of Australia are set to double over the next 20-30 years."

"The long-term benefits of Brisbane's parallel runway system will only be realised if operational restrictions such as movement caps and curfews are avoided."

This dispels any doubt about the neutrality of Airservices who are simply doing the bidding of the aviation industry at the expense of ordinary Australians. All trust is lost. Further, Airservices have admitted in Senate Estimate hearings that they have long ceased their original function as a regulator. BFPCA has no faith in either their ability or resources to fix the problem. We thus continue to call for a change to their CEO and ultimately the re-integration of Airservices into CASA.

As a result of the total loss of trust, BFPCA demands that independent external airspace design experts are engaged through an open and competitive tender process. This need is further corroborated by the fact that Airservices let go of many experienced members of staff as part of a redundancy program. Yet, they are now advertising for new airspace designers who have to be recruited and trained up first – likely done poorly considering past experience and internal staff feedback. BFPCA has no confidence in Airservices dispatching poorly trained staff trying to do a highly complex job.



This extends not just to the flight path and airspace design but also includes the community engagement and communication tasks outlined in section 6.3. The community has lost all trust in Airservices considering leaked documents, whistle blower accounts, the experienced deceit and collusion with the private airport operator. As a result, BFPCA demands that the community engagement and communication task is performed directly by the federal Department.

We further demand that any work to be undertaken by Airservices to implement any of the measures in the draft report that we support must be undertaken as a fully costed, fully funded, time-boxed AirServices project.

Community's Key Demands Still Stand

More importantly, we reiterate the **community's key demands**. Although Brisbane airport is smaller than Sydney airport and manages less traffic – we are confident that the same measures that apply for Sydney airport would also have a significant and beneficial impact on aircraft noise in Brisbane. Therefore we once again request that the following demands be actioned as a matter of priority:

1. Independent Airspace Redesign

Continue the appointment of an independent airspace and air traffic management consultancy to redesign the flight path changes, runway operational changes, and implement international best practice noise abatements to be deployed at Brisbane Airport.

2. Ministerial Direction to Redesign

Issue an immediate Ministerial Direction to Airservices Australia as provided for under the *Air Services Act 1995*, Section 16(1), which requires Airservices to engage an independent external airspace design consultancy to lead the redesign of the Brisbane airspace and flight paths that will (i) remedy the current concentration of noise pollution over Brisbane families and communities, and; (ii) achieve a significant and noticeable reduction overall in the noise pollution and health impacts experienced by Brisbane families and communities. This includes introducing international best practice noise abatement procedures such as prioritising SODPROPS at all times and meeting quarterly noise abatement performance targets.

3. Brisbane Airport Community Forum

Discontinue the Brisbane Airport Community Aviation Consultation Group (BACACG) chaired by Brisbane Airport, and instead establish a strong, independent, permanent, and fully funded Brisbane Airport Community Forum that will:

- Deal with aircraft noise abatement and related environmental issues and have access to all necessary data, performance targets and technical expertise;
- Have broad representation of all areas affected by airport operations;

- Be chaired independently with terms of reference designed to avoid any perception of or susceptibility to industry capture, including by regulators, aviation companies, or the airport operator;
- Receive secretariat support from the Department of Infrastructure, Transport, Regional Development and Communications.

4. Long-Term Operating Plan

Issue an immediate Ministerial Direction to Airservices Australia as provided for under the *Air Services Act 1995*, Section 16(1), which requires Airservices to engage in a major consultative process over 12 months to develop the Brisbane Airport Long-Term Operating Plan (LTOP) to better manage the aircraft noise associated with Brisbane Airport. The LTOP is to ensure that aircraft movements are maximised over water and non-residential land. The Brisbane Airport Community Forum becomes the main body for consultation on the Brisbane LTOP.

5. Curfew

Legislate a Brisbane Airport Curfew Act that introduces a curfew from 10 pm to 6 am.

6. Airport Capacity Declaration

Issue an Airport Capacity Declaration for Brisbane Airport of 45 flights an hour as provided for under the *Airports Act 1996*, Section 195, in order to provide Brisbane families and communities with certainty about the maximum number of flights to expect in a given day as well as into the future.

7. Collect Aircraft Noise Levies

Declare Brisbane Airport a leviable airport under the *Aircraft Noise Levy Act 1995* to impose and collect aircraft noise levies. These levies are to be distributed as compensation to all Brisbane residents in the vicinity of any of Brisbane Airport's flight paths and within the noise contours associated with compromised health and educational outcomes.

8. Amend the Air Services Act 1995

Amend the *Air Services Act 1995* to free Airservices Australia from its regulatory capture by the aviation industry and ensure it protects the human and natural environment, community amenity and residential areas from the effects of the operation and use of aircraft. These regulatory changes will also include strengthening the independence and authorities of the Aircraft Noise Ombudsman (ANO) and integrating the ANO with the Office of the Commonwealth Ombudsman.

Timeframe

BFPCA further finds that **the proposed time frame is too long**. Families and communities have been suffering for more than two years. The prospect of having to wait for substantial changes for another three years is untenable. External airspace experts such as NavBlue, ENAV, etc. must be brought in, specifically for the more complex airspace redesign tasks. In particular, to reduce the current timeframe, BFPCA demands that the aforementioned recommendations supported by us are implemented within two years – aiming for the **November AIRAC 2024** for implementation.

Revised Noise Abatement Procedures for Brisbane

Additionally and as aforementioned, BFPCA demands that SODPROPS is reinstated as the priority mode at all times (24/7) now. We table the attached revised **Noise Abatement Procedures for Brisbane including a binding Noise Abatement Operating Plan for Airservices immediate attention and implementation.**

BFPCA represents the interests of Brisbane residents across some 81 post codes across Brisbane. We welcome the opportunity to work with Airservices in an advisory role regarding the nature and extent of impact of aircraft noise and any proposed flight path changes on the wider Brisbane community, and look forward to the establishment of a strong, independent, permanent, and fully funded Brisbane Airport Community Forum.

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Appendix

1. Cover note to the revised Noise Abatement Procedures for Brisbane
2. Noise Abatement Procedures for Brisbane
3. Brisbane Noise Abatement Operating Plan, Version 0.1
4. BAC Runway Operating Plan: Changes from 2006 to 2020
5. Airservices document: "Proposal to Increase Allowable Tailwind at Brisbane Airport – Key Messages," February 2022



Revised Noise Abatement Procedures for Brisbane including a binding Noise Abatement Operating Plan

Already back in November 2020, BFPCA published evidence of SODPROPS being heralded as the number one priority mode 24/7 during the 2007 MDP/EIS consultation, only for this mode to be subsequently silently removed by Airservices without notice, community consultation or ministerial review or approval.

If Airservices wants to rebuild trust with Brisbane communities, we suggest implementing our revised **Noise Abatement Procedures (NAP) for Brisbane** including a binding **Noise Abatement Operating Plan**. The proposed revised NAP procedures (attached) comprise small changes that can be made relatively quickly, by NOTAM for industry and by issuing a Temporary Local Instruction (TLI) for ATCs.

The major points of our proposed amendments:

1. SODPROPS as preferred operating mode 24/7
2. Turboprop departures RWY 19R between 0500-0600 local to be radar vectored out to sea to gain height before tracking over populated areas
3. Removal of AEDT timings
4. Slight increases in heights for arriving aircraft

We will expand further below as to why we believe that the above changes are achievable and will work towards providing some immediate noise relief to the community whilst other TRAX recommendations are underway.

SODPROPS as preferred operating mode 24/7

We acknowledge that SODPROPS is not a usable mode 24/7 due the complexities and delays that occur when expected arrival rates exceed 20/hr. Having said that, currently there is no requirement for ATC to try to use SODPROPS outside of 2200-0600 daily as the mode is not listed as required. SODPROPS is the preferred mode at YSSY outside of curfew hours, and Sydney ATC do use it during the day when arrival rates make it available. **This is what we would like to see happen at Brisbane**. The nomination of SODPROPS as the preferred mode will, we hope, bring about a **change of culture** whereby ATC will always aim to use this mode whenever possible, rather than only using it when they must.

Turboprop departures RWY 19R between 0500-0600 local to be radar vectored out to sea to gain height before tracking over populated areas

The departures from RWY 19R between 0500-0600 local are designed to reduce delays for jets departing RWY 01R. We accept this, however, the tracking of these aircraft (which depending upon mining charters can be a significant number) immediately over populated areas is an area of significant angst to the community. The proposed left turn off RWY 19R to headings of between 080 and 020 and then remaining over water until 4,000 feet will provide significant noise relief. We understand that this is a more complex departure routing, however, even with the jets departing RWY 01R on the ASISO One Departure, there



are ample headings available to provide separation assurance, particularly so with the requirement for jets at POTOV to be above 5,000 feet. From a tower perspective, we see the most complex issue between RWY 19R and RWY 01L departures is that a RWY 19R departure may be dependent on the RWY 01R departure to cater for a very hard turn and potentially crossing north of the RWY 01R threshold. Given the DER requirement from RWY 19R this is extremely unlikely, but could be mitigated by the above process.

Removal of AEDT timings

Currently, intersection departures are allowed between 0500-0600 AEDT. We understand that this is due to airline schedules changing to reflect daylight savings times in other capital cities. However, our community, and airport are located in Queensland and as such timings that provide small, but albeit at least some, noise relief should not change.

Slight increases in heights for arriving aircraft

We have proposed some very minor changes to the heights for arriving aircraft that should have no operational impact but will provide, again, some small relief for communities under the flight paths.

In addition to the above, BFPCA urges Airservices to fully implement the **ICAO Global Reporting Format (GRF) for runway surface conditions**. Currently, Airservices is using not completely DRY as a requirement for the use of SODPROPS where downwind exists. This precludes the use of SODPROPS in any runway conditions other than DRY with any downwind. By adopting braking characteristics as well, **the use of SODPROPS may be extended**. We propose that assessment be made of the use of SODPROPS in circumstances where the runway condition is not reported as “Contaminated Runway” and/or braking characteristics are reported as “GOOD to MEDIUM” or better. For example, Runway Conditions “WET” Braking Characteristics “GOOD”, SODPROPS may still be nominated. This is the intent of the ICAO GRF, to actually identify when the runway conditions have an impact upon aircraft operations.

We have also proposed an ATC Plan, or charter, for what we see as a higher level of engagement with the community and improved visibility AND accountability of operating modes and how they are applied. We acknowledge that some of the titles and roles may not align exactly with current Airservices structure, however, we believe that this could be used as a template for moving forward together to resolve the ongoing concerns of community for noise relief and industry for operational efficiency and growth.

BFPCA

Attached:

- Revised Noise Abatement Procedures for Brisbane
- Brisbane Noise Abatement Operating Plan, Version 0.1



NOISE ABATEMENT PROCEDURES BRISBANE

Air Traffic Control will maximise the use of preferred flight paths and over water operations to minimise noise impacts on the community. Pilots and Air Traffic Control will determine when critical operational requirements that impact safety preclude the use of noise abatement procedures.

1. PREFERRED RUNWAYS OPERATIONS

Simultaneous Opposite Direction Parallel Runway Operations

Simultaneous Opposite Direction Parallel Runway Operations (SODPROPs) is the preferred (LAND RWY19R, TAKE-OFF RWY01R) operational mode at Brisbane Airport. This mode is designed to provide the best noise relief to the community, however does not always meet the operational requirements relating to expected traffic levels.

When traffic levels and weather conditions allow, SODPROPs will be the nominated operational mode. The maximum arrival rate to allow SODPROPs is 20 aircraft/hr. This is likely to occur during periods of low demand in the evening during the week, and evening and early morning at the weekend. Where predicted arrival rates are below 20/hr for at least 75 minutes and the requirements below are met SODPROPs will be nominated.

Requirements for operating SODPROPs are as follows:

1. Arrival rate not exceeding 20/hr
2. Visibility 8KM
3. Cloud base not less than 2500ft, and
4. The runway conditions defined in AIP ENR nomination of runways clause.

Peak Periods

0600-2200 HR Local Daily

PRIORITY	LAND	TAKE-OFF
1	RWY 19R	RWY 01R
2	RWY 19L/R	RWY 19L/R
3	RWY 01L/R	RWY 01L/R

Off Peak Periods

2200-0600 Local Daily

PRIORITY	LAND	TAKE-OFF
1	RWY 19R	RWY 01R (Limited turboprops off RWY 19R 0500-0600 Local time)
2	RWY 19R	RWY 01R (Dependent Opposite Direction Parallel Runway Operations)
3	RWY 19L/R	RWY 19L
4	RWY 01R	RWY 01L/R

RWY01L arrivals and RWY19R jet departures not permitted between 2200-0600 local unless, due weather or operational issues such as loss of airport infrastructure, these are the only runways available for use.

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Peak and Off Peak preferred runway operations will be nominated during normal operations. Air Traffic Control may nominate alternative runway configurations when required due to critical operational requirements or unusual operations such as emergencies.

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Between 0500-0600 local a limited number of RWY19R non-jet departures may be facilitated to reduce delays for jet aircraft departures from RWY01R. Departures from RWY 19R during this period shall be radar vectored as per 7.2, 1c.

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Simultaneous Opposite Direction Parallel Runway Operations¶
From 2200-0600 local, Simultaneous Opposite Direction Parallel Runway Operations (SODPROPs) is preferred (LAND RWY19R, TAKE-OFF RWY01R).¶
When traffic levels and weather conditions allow, SODPROPs may be used at other times to achieve the best possible noise abatement outcomes. This is likely to occur during periods of low demand in the evening during the week, and evening and early morning at the weekend.¶
Requirements for operating SODPROPs are as follows:¶
Visibility 8KM¶
Cloud base not less than 2500ft, and¶
The runway conditions defined in AIP ENR nomination of runways clause.¶

If visibility is less than 8km or the cloud base is less than 2500ft, Dependant Opposite Direction Parallel Runway Operations (DODPROPS) will become the preferred mode during Off Peak hours and the runway conditions defined in the AIP ENR nomination of runway clause are met.

Pilots may request an arrival RWY19L/R or departure RWY01R when tailwind exceeds 5KTS during Off Peak hours.

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5. RUNWAY 19L/R JET DEPARTURES

Jet noise abatement climb procedures apply as follows:

1. Noise Abatement Departure Procedures (NADP) required for all jet departures including radar departures.
2. NADP1 required if SID cancelled by ATC at Pilot request except due weather.
3. All jet ACFT to comply with minimum clean speed, or MAX IAS 250KT below 10000FT.

6. INTERSECTION DEPARTURES

Intersection departures RWY19L/R

0600-2200 local:

Not permitted for aircraft exceeding 30,000KG MAUW except aircraft not exceeding ICAO Code letter C aerodrome reference code from intersections A3, T2 or T3.

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2200-0600 local:

Not permitted for all aircraft.

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7. PREFERRED FLIGHT PATHS

7.1 Arriving Aircraft

1. Landing runway 19L/R:
 - a. From 0600-2200 local, all JET aircraft will not be descended below 4000ft until east of the coast to avoid noise sensitive areas.
 - b. From 2200-0600 local, descent below 5000ft is not permitted for all JET aircraft until east of the coast.
 - c. From 2200-0600 local, descent below 4000ft is not permitted for all NON-JET aircraft until east of the coast.
2. Landing runway 01R:
 - a. From 0600-2200 local, all aircraft shall not descend below 3000ft until aligned with 01R centreline.
3. Landing runway 01L/R:
 - a. Use, as the final landing flap setting, the minimum certified landing flap setting approved by the operator for the applicable conditions.

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- b. JET aircraft conducting a visual approach, ATC will issue an instruction to join final south of the Brisbane River.
- c. NON-JET aircraft 5700KG conducting a visual approach, ATC will issue an instruction to join final south of the Brisbane River when ETA is:
 - i. 200-2300 or
 - ii. 0600-1200

7.2 Departing Aircraft

- 1. Departing runway 19L/R:
 - a. JET aircraft will normally be assigned a procedural SID.
 - b. NON-JET aircraft will normally be assigned a radar SID.
 - c. From 2200-0600 local, NON-JET aircraft shall be assigned headings between 080° and 020° and contained over water until above 5000FT.
- 2. Departing runway 01L/R:
 - a. JET aircraft will normally be assigned a procedural SID.
 - b. NON-JET aircraft will normally be assigned a radar SID.
 - c. From 2200-0600 local, all aircraft will be contained over water until above 4000FT.

NOTE 1: In the above procedures, the term "all aircraft" applies to all jet propelled aircraft and other aircraft with MTOW exceeding 5700KG, and all other fixed wing aircraft having two or more engines.

NOTE 2: Procedural SIDs issued to JET aircraft all have preferred noise abatement procedure flight paths.

NOTE 3: JET aircraft may be cleared via a radar SID when required for weather, traffic management or when a pilot cannot accept a procedural SID. When this occurs, aircraft will be processed as closely as possible to comply with the applicable Day or Night Operations NAP.

8. LANDING – USE OF REVERSE THRUST

Between 2200 and 0600 local time pilots are requested to minimise the use of reverse thrust where operationally acceptable.

9. TRAINING FLIGHTS – See AIP/ERSA

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Brisbane Noise Abatement Operating Plan

Version 0.1

Document Change History

Version	Valid From	Details	Author
0.1	17/11/2022	Initial Draft	BFPCA, Inc.

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1 Introduction

Airservices, as the agency responsible for Air Traffic Management (ATM) at Brisbane Airport has numerous stakeholders. We need to cater for the changing nature of aircraft operations, air traffic growth, airport expansion and advances in aviation technology, while keeping aviation safety and environmental and community protection as our first two priorities.

All Airservices staff are reminded of our legislated obligation as stated in the *Air Services Act 1995*:

§9 Manner in which AA must perform its functions

(1) In exercising its powers and performing its functions, AA must regard the safety of air navigation as the most important consideration.

*(2) Subject to subsection (1), AA must exercise its powers and perform its functions in a manner that ensures that, as far as is practicable, **the environment is protected from:***

(a) the effects of the operation and use of aircraft; and

(b) the effects associated with the operation and use of aircraft.

This requires a careful balance of ensuring safety (§9.1) and protecting the environment and minimising the effects of aviation noise on the community (§9.2).

We recognise that aircraft noise is an inevitable by-product of aircraft operations and can be the cause of adverse community reaction to aviation operations. While it is not possible to guarantee any suburb, group or individual will be exempt from aircraft noise, we are committed to world's best practice aircraft noise abatement and minimisation processes and practice, to respectfully managing noise complaints, and to providing transparent information to communities.

2 Background

Since the opening of the New Parallel Runway (NPR) there have been significant community concerns regarding excessive aircraft noise pollution. Noise Abatement Procedures (NAP) are published for Brisbane, and must be applied except under certain, prescribed circumstances.

Community expectations have not been met regarding aircraft noise, and expected operating modes. As a result of these failures, Airservices and Brisbane Airport have not been able to obtain a social licence to operate the airspace and flight paths. In response, this document is aimed at providing a clear framework for:

- Strategic planning of daily operating modes
- Community advice of expected modes
- Advice to the community of reasons for tactical changes to operating modes

Airservices is committed to applying preferred operating modes on every occasion that it is possible to do so.

Whilst all environmental concerns must be considered (not just noise), some airborne holding, or ground based delays will be accepted where there is a reasonable offset by reducing noise in the community.

3 Simultaneous Opposite Direction Parallel Runway Operations (SODPROPS)

SODPROPS is the most effective noise mitigating operating mode available. As the Number 1 preferred operating mode, SODPROPS is the default mode that shall always be considered as first priority 24/7.

Airservices is committed to utilising SODPROPS at every opportunity.

When SODPROPS cannot be utilised, it is vital that clear and effective reporting of the reasons why it could not be used are communicated to the community.

3.1 Mode Changes

It is acknowledged that multiple operating mode changes add complexity and risk to operations. In line with this, and to minimise multiple mode changes, SODPROPS, during Peak periods shall be used whenever the required conditions are met, and the arrival rate is 20/hr or less for a 75-minute period. This will allow for approximately 60 minutes of SODPROPS operation and time for mode changes at either end of SODPROPS.

The holding detailed at para 3.2 shall be used to achieve this 75 minute window.

3.2 Allowed Holding

To maximise the use of SODPROPS, the following average holding times shall be used when the arrival rates approach or exceed 20/hr:

- Peak periods
 - Average 5 minutes airborne holding to maintain arrival rate of 20/hr
- Off-Peak periods
 - Holding shall be maintained as required to maintain the modes

4 Operating Modes

Operational Modes are published in DAP for Brisbane Airport. These modes have varying noise impacts upon communities surrounding the airport. Preferred operating modes have been published for both Peak (0600-2200) and Off-Peak (2200-0600) hours.

4.1 Preferred Modes-Peak Hours

The modes detailed in table 1 are the preferred priorities for operating modes during peak periods. Priority Mode 1 shall always be the first considered mode of operations and nominated except where all the conditions of use cannot be met.

PRIORITY	LAND	TAKE-OFF
1	RWY 19R	RWY 01R
2	RWY 19L/R	RWY 19L/R
3	RWY 01L/R	RWY 01L/R

Table 1: Peak Preferred Modes

4.2 Preferred Modes-Off-Peak Hours

During off-peak periods (nominal sleeping hours) noise abatement is an even higher priority for our community. Priority Modes 1 and 2 shall be used in all possible circumstances. Where delays may occur to aircraft due modes 1 or 2 in off peak periods, then aircraft shall be held to allow the modes to remain in operation.

The NOC, in consultation with the TM shall determine arrival rates where this may occur and issue the applicable advisory holding fuel NOTAMs.

PRIORITY	LAND	TAKE-OFF
1	RWY 19R	RWY 01R (Limited turboprops off RWY 19R 0500-0600 Local time)*
2	RWY 19R	RWY 01R (Dependent Opposite Direction Parallel Runway Operations)
3	RWY 19L/R	RWY 19L
4	RWY 01R	RWY 01L/R

Table 2: Off-Peak Preferred Modes

Note: 1. From 2200-0600 local, NON-JET aircraft shall be assigned headings between 080° and 020° and contained over water until at or above 4000FT.

Note: During this period, expedition of departures takes a lower priority than noise abatement. Dependant departures RWY 01R and RWY 19R may need to be applied.

5 Community Engagement

Open, honest, and frank engagement is an important part of how Airservices needs to interact with the communities that are affected by aircraft noise. By providing as much information as is practicable, Airservices can work with communities to show that we are serious about reducing the noise impact on our neighbours.

5.1 Expected Mode Reporting

At 2000 local each evening, the National Operations Centre (NOC) shall provide the Brisbane Traffic Manager (TM) the forecast arrival rates for the following days operations, covering the period 0500-2200 local.

Utilising arrival data, and forecast weather, the TM shall develop and publish an expected Daily Operating Mode Plan for the following day.

The plan shall identify:

- Hourly forecast arrival rates
- Forecast
- Eligibility for SODPROPS based on:
 - Arrival rate
 - Weather
- Planned operating mode

An example Daily Operating Plan is shown at Table 3.

Daily Operating Mode Plan-18 OCT 2022						
Hours (LCL)	Arr Rate	SODPROPS Eligible-Rate	SODPROPS Eligible WX	Planned Mode	Mode Used	Exception
05-06	8	Y	Y	SODPROPS		
06-07	15	Y	Y	SODPROPS		
07-08	22	N	Y	19L/R		
09-09	24	N	N	19L/R		
18-19	25	N	Y	01L/R		
19-20	21	N	Y	01L/R		
20-21	21	N	Y	19L/R		
21-22	18	Y	Y	SODPROPS		

Table 3: Example Daily Operating Mode Plan-Day Prior

This plan shall be published on the Airservices dedicated Airservices Brisbane Community webpage.

5.2 Actual Mode Used Reporting

Each day at 2200 an Actual Mode Used Report shall be completed and published on the dedicated Airservices Brisbane Community webpage. The Actual Mode Used report shall take the planned Daily Operating Mode Report and include actual mode usage.

Detailed exception reporting as per 5.3 shall be provided on this webpage also.

Actual Mode Used Report-18 OCT 2022						
Hours (LCL)	Arr Rate	SODPROPS Eligible-Rate	SODPROPS Eligible WX	Planned Mode	Mode Used	Exception
05-06	8	Y	Y	SODPROPS	SODPROPS	-
06-07	15	Y	Y	SODPROPS	19L/R	Runway wet
07-08	22	N	Y	19L/R	19L/R	-
09-09	24	N	N	19L/R	01L/R	Early wind change
18-19	25	N	Y	01L/R	01L/R	-
19-20	21	N	Y	01L/R	19L/R	Light winds
20-21	21	N	Y	19L/R	SODPROPS	Lower arrival rate
21-22	18	Y	Y	SODPROPS	SODPROPS	-

Table 4: Example Actual Mode Used Report-Day Completion

5.3 Exception Reporting

Where preferred operating modes cannot be used, there must be a valid, reasonable reason that can be communicated. Terms such as operational requirements, pilot requests should not be the sole reason communicated to our community as these can be perceived as Airservices avoiding meeting our legislated obligations to protect communities under the *Air Services Act 1995*, §9(2).

Exception reporting shall include:

- Weather conditions on the ATIS

- Forecast and actual arrival rates
- Where pilots depart from non-nominated runways, (e.g., Departure RWY 19L during SODPROPS), the
 - Aircraft type
 - ATD
 - Reason, where provided by the pilot
- Other extenuating circumstances
 - E.g., Thunderstorms, staffing, emergencies
 - As much detail as available shall be reported

As much detail as possible shall be recorded for exceptions, ensuring visibility and openness for all stakeholders.

6 Summary

Airservices commits to making NAP a core part of Brisbane operations. This plan provides the details for our operational staff, as well as providing a clear line of communication to the communities effected by aircraft noise.

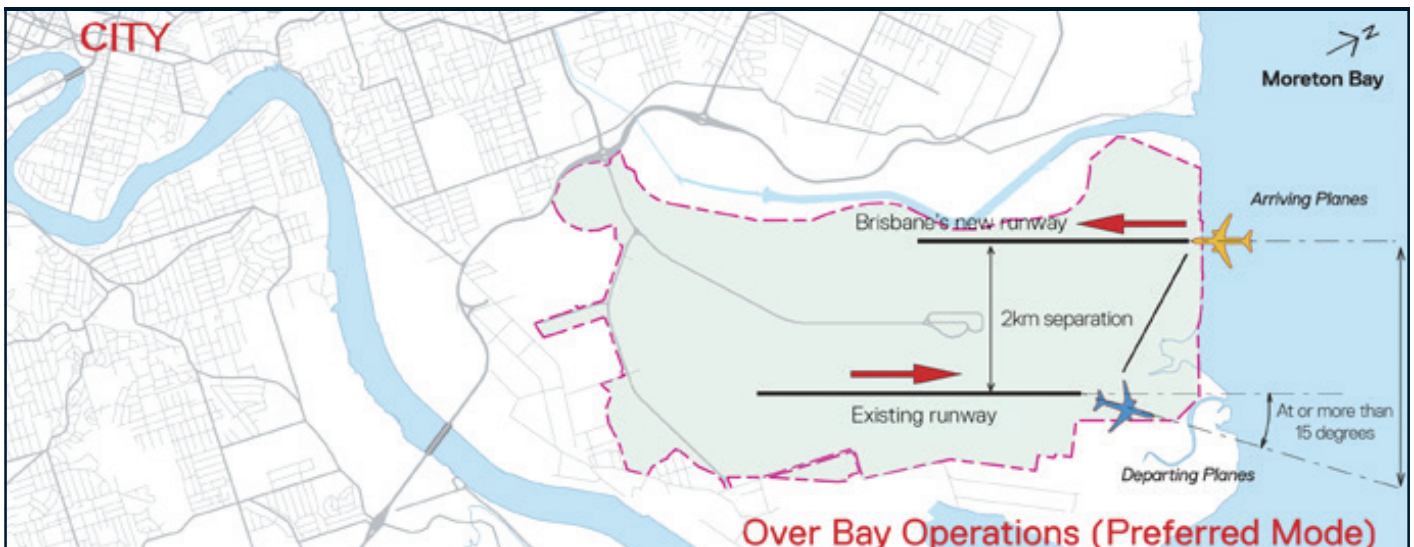
It is incumbent on all staff to ensure that not only the intent, but the spirit of achieving our aims of minimising noise impacts upon our community is achieved.

BAC Runway Operating Plan

Changes from 2006 to 2020



30/12/2020



2006



Source: https://www.bne.com.au/sites/default/files/docs/Brisbanes-New-Runway_Operations-Fact-Sheet.pdf

2006

SODPROPs (over the bay) preferred mode weekday and weekend, day and night.

Disclaimer: Day Mode – “passive’ i.e. at Airservices Australia discretion to be used if air traffic are low for an extended period”



Source: 2006 BAC Environmental Impact Statement Volume D10, p. 401



Table 10.4a: Weekday Operations – Monday to Friday.

WEEKDAY OPERATIONS – Monday to Friday		
Day Mode (6am to 8pm)	1. →	Mode 1: SODPROPs (downwind up to 5 knots) – ‘passive’ i.e. at Airservices Australia discretion to be used if air traffic are low for an extended period
	2.	Mode 6: RWY19 Mixed Parallel
	3.	Mode 2: RWY01 Mixed Parallel
Evening Mode (8pm to 10pm)	1. →	Mode 1: SODPROPs (downwind up to 5 knots) – ‘active’ i.e. to be used if available
	2.	Mode 6: RWY19 Mixed Parallel
	3.	Mode 2: RWY01 Mixed Parallel
Night Mode (10pm to 6am)	1. →	Mode 1: SODPROPs (downwind up to 5 knots) – ‘active’
	2.	Mode 11: DODPROPs (downwind 5 to 10 knots) – ‘active’
	3.	Mode 12: DODPROPs + 19R non-jet departures
	4.	Mode 9: RWY19 Semi-mixed Parallel – departures RWY19L only (or Mode10b)
	5.	Mode 4: RWY01 Semi-mixed Parallel – arrivals RWY01R only (or Mode 10a)

Table 10.4b: Weekend Operations – Saturday and Sunday.

WEEKEND OPERATIONS – Saturday and Sunday		
Day Mode (8am to 8pm)	1. →	Mode 1: SODPROPs (downwind up to 5kts) – ‘passive’ i.e. at Airservices Australia discretion
	2.	Mode 6: RWY19 Mixed Parallel
	3.	Mode 2: RWY01 Mixed Parallel
Evening Mode (8pm to 10pm)	1. →	Mode 1: SODPROPs (downwind up to 5kts) – ‘active’ i.e. must be used if available
	2.	Mode 6: RWY19 Mixed Parallel
	3.	Mode 2: RWY01 Mixed Parallel
Night Mode (10pm to 6am)	1. →	Mode 1: SODPROPs (downwind up to 5 knots) – ‘active’
	2.	Mode 11: DODPROPs (downwind 5 to 10 knots) – ‘active’
	3.	Mode 12: DODPROPs + 19R non-jet departures
	4.	Mode 9: RWY19 Semi-mixed Parallel – departures RWY19L only (or Mode10b)
	5.	Mode 4: RWY01 Semi-mixed Parallel – arrivals RWY01R only (or Mode 10a)
Early Morning (6am to 8am)	1. →	Mode 1: SODPROPs (5 knots) – ‘active’ i.e. must be used if available
	2.	Mode 6: RWY19 Mixed Parallel
	3.	Mode 2: RWY01 Mixed Parallel

2014

SODPROPs (over the bay) preferred mode weekday and weekend, day and night.

Disclaimer changed and moved to the bottom in small print: “Mode allocation is both weather and demand dependent and Modes 1 and 2 will be actively allocated within agreed demand rates and down wind criteria.”



Source: 2014 BAC Flight Path and Noise Information Booklet, p. 11



TABLE 2: PARALLEL RUNWAY OPERATING PLAN

WEEKDAY OPERATIONS – MONDAY TO FRIDAY¹

Time	Number of Available Modes	Preferred Sequence of Application
Day Mode (6am to 8pm)	3	→ Mode 1: SODPROPs (downwind up to 5kts) – ‘passive’ Mode 3: RWY 19 Mixed Parallel Mode 4: RWY 01 Mixed Parallel
Evening Mode (8pm to 10pm)	3	→ Mode 1: SODPROPs (downwind up to 5kts) – ‘active’ Mode 3: RWY 19 Mixed Parallel Mode 4: RWY 01 Mixed Parallel
Night Mode (10pm to 6am)	6	→ Mode 1: SODPROPs (downwind up to 5kts) – ‘active’ Mode 2: DODPROPs (downwind up to 10kts) – ‘active’ Mode 5: RWY 19 Semi-mixed Parallel – departures RWY 19L only Mode 6: RWY 01 Semi-mixed Parallel – arrivals RWY 01R only Mode 3: RWY 19 Mixed Parallels Mode 4: RWY 01 Mixed Parallels

WEEKEND OPERATIONS – SATURDAY AND SUNDAY¹

Time	Number of Available Modes	Preferred Sequence of Application
Day Mode (8am to 8pm)	3	→ Mode 1: SODPROPs (downwind up to 5kts) – ‘passive’ Mode 3: RWY 19 Mixed Parallel Mode 4: RWY 01 Mixed Parallel
Evening Mode (8pm to 10pm)	3	→ Mode 1: SODPROPs (downwind up to 5kts) – ‘active’ Mode 3: RWY 19 Mixed Parallel Mode 4: RWY 01 Mixed Parallels
Night Mode (10pm to 6am)	6	→ Mode 1: SODPROPs (downwind up to 5kts) – ‘active’ Mode 2: DODPROPs (downwind up to 10kts) – ‘active’ Mode 5: RWY 19 Semi-mixed Parallel – departures RWY 19L only Mode 6: RWY 01 Semi-mixed Parallel – arrivals RWY 01R only Mode 3: RWY 19 Mixed Parallels Mode 4: RWY 01 Mixed Parallels
Early Morning (6am – 8am)	3	→ Mode 1: SODPROPs (downwind up to 5kts) – ‘active’ Mode 3: RWY 19 Mixed Parallel Mode 4: RWY 01 Mixed Parallel

¹ Mode allocation is both weather and demand dependent and Modes 1 and 2 will be actively allocated within agreed demand rates and down wind criteria.



2020

Now SODPROPs (over the bay) only at night.

Disclaimer: “When traffic levels and weather conditions allow, SODPROPs may be used at other times to achieve the best possible noise abatement outcomes. This is likely to occur during periods of low demand in the evening during the week, and evening and early morning at the weekend.”

Source: 2020 BAC Noise Information Booklet, p. 11



TABLE 2: PARALLEL RUNWAY OPERATING PLAN

WEEKDAY OPERATIONS – MONDAY TO FRIDAY

Time	Number of Available Modes	Preferred Sequence of Application
Day Mode (6am to 6pm)	2	Mode 3: RWY 19 Mixed Parallel Mode 4: RWY 01 Mixed Parallel
Evening Mode (6pm to 10pm)	2	Mode 3: RWY 19 Mixed Parallel Mode 4: RWY 01 Mixed Parallel
Night Mode (10pm to 6am)	4	Mode 1: SODPROPs (Visual conditions and tailwind up to 5kts) – ‘active’ to be used if available Mode 2: Reciprocal Operations (tailwind up to 5kts, lower cloud base and/or visibility) – ‘active’ to be used if available Mode 3A: RWY 19 Semi-mixed Parallel – departures RWY 19L only Mode 4A: RWY 01 Semi-mixed Parallel – arrivals RWY 01R only

WEEKEND OPERATIONS – SATURDAY AND SUNDAY

Time	Number of Available Modes	Preferred Sequence of Application
Day Mode (6am to 6pm)	2	Mode 3: RWY 19 Mixed Parallel Mode 4: RWY 01 Mixed Parallel
Evening Mode (6pm to 10pm)	2	Mode 3: RWY 19 Mixed Parallel Mode 4: RWY 01 Mixed Parallel
Night Mode (10pm to 6am)	4	Mode 1: SODPROPs (Visual conditions and tailwind up to 5kts) – ‘active’ to be used if available Mode 2: Reciprocal operations (tailwind up to 5kts, lower cloud base and/or visibility) – ‘active’ to be used if available Mode 3A: RWY 19 Semi-mixed Parallel – departures RWY 19L only Mode 4A: RWY 01 Semi-mixed Parallel – arrivals RWY 01R only

“Early morning” mode 6am to 8am removed altogether.

When traffic levels and weather conditions allow, SODPROPs may be used at other times to achieve the best possible noise abatement outcomes. This is likely to occur during periods of low demand in the evening during the week, and evening and early morning at the weekend.

2020

Now SODPROPs (over the bay) only at night.

Disclaimer: “When traffic levels and weather conditions allow, SODPROPs may be used at other times to achieve the best possible noise abatement outcomes. This is likely to occur during periods of low demand in the evening during the week, and evening and early morning at the weekend.”

Source: Noise Abatement Procedures Brisbane, Airservices Australia, 21 May 2020, p. 1



NOISE ABATEMENT PROCEDURES BRISBANE

Air Traffic Control will maximise the use of preferred flight paths and over water operations. Pilots and Air Traffic Control will determine when critical operational requirements preclude the use of noise abatement procedures.

1 PREFERRED RUNWAYS OPERATIONS

Day

0600-2200 HR Local Daily.

PRIORITY	LAND	TAKE-OFF
1	RWY 19L/R	RWY 19L/R
2	RWY 01L/R	RWY 01L/R

Night

2200-0600 HR Local Daily.

PRIORITY	LAND	TAKE-OFF
1	RWY 19R	RWY 01R (Limited turboprops off RWY 19R 0500-0600 Local time)
2	RWY 19L/R	RWY 01R (Reciprocal Runway Operations)
3	RWY 19L/R	RWY 19L
4	RWY 01R	RWY 01L/R

RWY01L arrivals and RWY19R jet departures not permitted between 2200-0600 local unless, due weather or operational issues such as loss of airport infrastructure, these are the only runways available for use.

Day and Night preferred runway operations will be nominated during normal operations. Air traffic control may nominate alternative runway configurations when required due to critical operational requirements or unusual operations such as emergencies.

Simultaneous Opposite Direction Parallel Runway Operations

From 2200-0600 local, Simultaneous Opposite Direction Parallel Runway Operations (SODPROPs) is preferred (LAND RWY19R, TAKE-OFF RWY01R). When traffic levels and weather conditions allow, SODPROPs may be used at other times to achieve the best possible noise abatement outcomes. This is likely to occur during periods of low demand in the evening during the week, and evening and early morning at the weekend.

Requirements for operating SODPROPs are as follows:

- Visibility 8KM
- Cloud base not less than 2500ft
- Tailwind component does not exceed 5KTS (including gusts)
- Runway surface is completely dry

Between 0500-2200 local a limited number of RWY 19R non-jet departures may be facilitated to reduce delays for jet aircraft departures from RWY 01R.

If visibility is less than 8km or the cloud base is less than 2500ft, reciprocal runway operations will become the preferred mode during Night hours providing:

- Tailwind component does not exceed 5kts (including gusts) and
- Runway surface is completely dry

Pilots may request an arrival RWY 19L/R or departure RWY 01R when tailwind exceeds 5KTS during Night hours.



2020



Source: <https://aircraftnoise.airservicesaustralia.com/2020/06/03/brisbane-noise-abatement/>

2020



2006

Since opening:

- 56% of all operations have been over the bay, that is, **44% have been over the city.**
- Between 10pm – 6am 83% have been over the bay, that is, **even at night time 17% of flights are routed over the city as there is no curfew in Brisbane.**

Source: Brisbane Airport Community Aviation Consultation Group (BACACG) Minutes 24/11/2020, <http://bacacg.com.au>

- ✗ 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 overflown by aircraft to be minimised to the extent practicable.
- ✗ Residential areas overflown by departing aircraft should not to the extent practicable also be overflown by arriving aircraft.

Source: 2006 BAC Flight Path and Noise Information Booklet, p. 60



Proposal to Increase Allowable Tailwind at Brisbane Airport – Key Messages

- To enable long-term growth at Brisbane Airport (BNE), Brisbane Airport Corporation Pty Ltd (BAC) must maintain the ability to operate with minimal operational constraints. This will be achieved through the management of community and political responses to increased aircraft noise complaints and the balanced optimisation of Flight Path Operations for noise benefit and efficiency.
- Despite COVID-19 causing a significant reduction in aircraft movements, both BAC and Airservices have seen an increase in noise complaints from sections of the Brisbane community since the opening of Brisbane Airport's New Parallel Runway in July 2020.
- As evidenced both internationally and within Australia, increased public pressure has resulted in operational restrictions at various airports, which have significantly impacted route development opportunities, aircraft efficiency, infrastructure utilisation and ultimately, long-term growth.
- The future profitability of Australia's major airlines will in part depend on BAC's ability to keep the parallel runway system unconstrained as movements along the east coast of Australia are set to double over the next 20-30 years. The airspace and runway system provides significantly greater efficiency and capacity than any other airport in Australia and relieves pressure on the east coast network, given the 80-movement cap and curfew in Sydney Airport and the LAHSO/weather constraints at Melbourne Airport.
- The long-term benefits of Brisbane's parallel runway system will only be realised if operational restrictions such as movement caps and curfews are avoided.
- Brisbane Airport's airspace and runway system provides significantly greater efficiency and capacity than any other airport in Australia and relieves pressure on the east coast network, given the 80-movement cap and curfew in Sydney and the Land and Hold Short Operations (LAHSO) / weather constraints in Melbourne. Without the proactive management of both community expectations and aircraft noise more broadly, long-term aviation growth at Brisbane Airport could be constrained through the imposition of operational restrictions.
- The increased use of Simultaneous Opposite Direction Parallel Runway Operations (SODPROPS) is one way of achieving greater efficiency for airlines while reducing the impacts of aircraft noise on the community. While the current 5 knot tailwind restriction results in night-time (10pm – 6am) "over the bay" use of around 50-52%, there is an opportunity to safely increase tailwind operations to enable greater "over the bay" night-time operations by ~20%. This increase in SODPROPS utilisation would also allow flexibility for more "over the bay" movements in the shoulder periods (before 10pm and after 6am).

