

# **BFPCA Submission: Archerfield Airport Preliminary Draft Master Plan (2022- 2042)**

11 Jan 2023





Brisbane Flight Path Community Alliance

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Prepared by **Brisbane Flight Path Community Alliance, Inc. (BFPCA)**

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This submission has been prepared by Brisbane Flight Path Community Alliance, Inc. (BFPCA) in response to the Archerfield Airport Corporation calling for written comments in response to the Archerfield Airport Preliminary Draft Master Plan (2022-2042) due 11 January 2023.

## Who is BFPCA?

Brisbane Flight Path Community Alliance (BFPCA) brings together Brisbane communities adversely affected by Brisbane Airport's flight paths – including noise pollution and human health impacts.

A new network of flight paths was designed by Airservices Australia for operation of the new parallel runway. Since this airspace design became operational in July 2020 there has been a severe increase in noise pollution and health impacts on thousands of people and many communities in Brisbane.

This common experience has brought these communities together to collaborate on and advocate for urgent actions to mitigate noise pollution and other impacts on communities living, learning and working under Brisbane's network of flight paths servicing Brisbane Airport, Archerfield Airport, and the Amberley RAAF base.

More information about BFPCA is available on our website at: <https://bfpca.org.au>

## Context for this submission

**Communities have the right to the quiet enjoyment of their neighbourhoods free from preventable, excessive, unsustainable and unmitigated airspace noise pollution.** Residents living under flight paths in Brisbane have not been afforded that right and have many concerns about the growth strategy proposed by the Archerfield Airport Corporation, which would see the addition of even more flights to an already very congested airspace above their homes. There is ample evidence to support our contention that the Department of Transport and Infrastructure, Airservices Australia, CASA, and the airports do not have the capability or capacity to manage something as complex as the growth proposed for the Brisbane aerodrome in a manner that protects our safety, our security, our privacy, our amenity and our sanity.

Serial failures by Airservices Australia (AsA), CASA, the Department of Transport & Infrastructure, and the Brisbane Airport Corporation (BAC) to protect the health and amenity of Brisbane residents has resulted in a large swathe of the Greater Brisbane City area already being subjected to unreasonable and excessive aircraft noise pollution that is harmful to human health. **Their most recent failure is the failure to rectify their failures.** The skies above Brisbane are a mess. The noise pollution imposed upon us by private corporations has stolen our lifestyle, our health, our financial security, our sanity, and fundamentally changed the character of our city. **We do not want to live in an "Aerotropolis."**



BFPCA and our community of supporters have severe concerns about the Archerfield Airport Preliminary Draft Master Plan (2022-2042), because it:

- **Prioritises Archerfield Airport Corporation’s private corporate growth and profit aspirations** and then relegates responsibility for noise abatement and mitigations to Airservices Australia and for land use planning to local and state governments, which are asked to deal with the fallout, e.g. excessive noise pollution and air contamination;
- Relies on **flawed and outdated ANEF noise contour modelling** that is misleading in their presentation and hides the true impact of aircraft noise pollution;
- Uses the “mark of endorsement” by Airservices Australia as a sham indication of quality assessment when Airservices Australia have recently admitted in Senate Estimates<sup>1</sup> that they are **no longer a regulator** but in fact a corporatised service provider to the aviation industry;
- Is largely **silent on the vital challenge of securing a social licence** to operate the Archerfield Airport through trusted and genuine community engagement, community governance arrangements, and community buy-in.

## Need for an integrated approach

As BFPCA has witnessed over and over again, the aviation industry works together seamlessly with all three levels of government when it comes to the approval of Master Plans and Major Development Plans. Yet, they all engage in buck passing and finger pointing when it comes to taking responsibility for the negative impact that stems from airport and flight operations. Sadly, the Archerfield Airport Preliminary Draft Master Plan (2022-2042) is no different, and this requires urgent attention and rectification.

Examples:

### §1.4.6

*“It will continue to work with BCC and other authorities to ensure that land use and development in the vicinity of the airport is undertaken such that:*

- *noise sensitive land uses are only carried out in areas subject to aircraft noise impacts if they are sited in accordance with the relevant standards and include appropriate noise protection measures; [...]*” (p. 24)

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<sup>1</sup> <https://bfpca.org.au/estimates/>

## §9.6.1

*“Working with AsA to identify and implement solutions to any noise complaints, where these relate to AAC’s areas of direct responsibility as airport operator.” (p. 115)*

The growth aspirations of Archerfield Airport Corporation will have a significant and major impact on the existing Brisbane population. Therefore it is not good enough to suggest that it is responsibility of Airservices Australia to deal with noise complaints while Archerfield Airport Corporation continues to grow unabated. It is not good enough to pass the buck to local and state governments to ensure people do not live near airports.

BFPCA have seen Brisbane Airport making submissions to Brisbane City Council requesting that residents “should be restricted from making noise complaints” through the registration of a covenant (ABC News, 18 Jan 2022<sup>2</sup>) because they live in proximity to an airport. The underlying assumption and value set that suggests the aviation industry takes the number one priority over everything else is offensive, arrogant and unacceptable.

**BFPCA asks that Archerfield Airport Corporation takes full responsibility for the negative community and environmental damage its airport operations cause. This must include:**

- Voluntarily joining the “**integrated planning, delivery and governance arrangements**”<sup>3</sup> that are being rolled out by Airservices Australia as part of the PIR Work Package 1 for Brisbane Airport;
- Archerfield Airport Corporation demanding that Airservices Australia funds and appoints an independent, well resourced third-party entity that is 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 in order to lead the Brisbane Airport PIR Work Package 4: This must entails an entire redesign of the Brisbane aerodrome including a **world best-practice and integrated flight path design** that takes into consideration all relevant airports including Brisbane, Archerfield, Amberley, Gold Coast, Sunshine Coast, Toowoomba / Wellcamp.
- **Introduce additional components to the airport’s use tariffs to penalise noise and air polluters.** This is to encourage the use of modern, environmentally friendly aircraft that

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<sup>2</sup> <https://www.abc.net.au/news/2022-01-18/brisbane-airport-concerns-over-barracks-development/100760830>

<sup>3</sup> Brisbane New Parallel Runway Flight Paths Post Implementation Review TRAX Independent Review Final Report, p. 36

produce less noise and emit less air pollution – see the example of Brussels Airport as a role model;<sup>4</sup>

- **Revamp the Archerfield Airport Community Aviation Consultation Group (AACACG)** using the Sydney Airport Community Forum as an example. The goal should be to establish a strong, independent, permanent, and fully funded Archerfield Airport Community Forum that will (i) deal with aircraft noise abatement and related environmental issues and have access to all necessary data, performance targets and technical expertise; (ii) have broad community representation of all areas affected by airport operations; (iii) 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 itself.

## ANEF noise contour modelling

The Archerfield Airport Preliminary Draft Master Plan (2022-2042) “includes a recently endorsed 2042 ANEF, as required under the Airports Act, and N70 mapping to assist with interpreting the pattern of noise from aircraft in flight” (p. 267). BFPCA argues that the strategy of employing an ANEF noise contour modelling approach – while required and necessary under the Airports Act – is not sufficient to inform the community of what is in store for them. The experience of Brisbane Airport’s New Parallel Runway (NPR) debacle has shown that communities neither easily access nor understand ANEF data.

Australia’s **National Airports Safeguarding Framework**<sup>5</sup> already back in 2016 suggested that:

*“Experience has shown a range of problems with relying solely on the ANEF as a noise information tool as there are limitations in using the ANEF to describe aircraft noise exposure to laypeople.*

*While the populations with the highest aircraft noise exposure often live within the 20 ANEF contour, experience shows the majority of noise complaints that are received come from residents living outside the 20 ANEF contour. Traditionally the residents of these areas have been given little information on aircraft noise through the ANEF system other than that the area is considered ‘acceptable’ for housing. Some people living outside the 20 ANEF contour have been given an expectation of receiving little or indeed no aircraft noise and as a consequence find the levels of noise actually experienced to be unacceptable.*

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<sup>4</sup> <https://www.brusselsairport.be/en/pressroom/news/new-airport-charges>

<sup>5</sup> Guideline A: Measures for Managing Impacts of Aircraft Noise, Attachment 1—Supplementary Aircraft Noise Metrics, <https://www.infrastructure.gov.au/infrastructure-transport-vehicles/aviation/aviation-safety/aviation-environmental-issues/national-airports-safeguarding-framework/national-airports-safeguarding-framework-principles-and-guidelines#a>

*[...] land use planning could be improved through recognition that aircraft noise does not suddenly stop at the 20 ANEF contour.” (p. 1)*

The experience<sup>6</sup> with Brisbane Airport’s flawed noise modelling for the NPR’s 2007 MDP/EIS has shown that:

- Communities are not easily able to translate decibel noise levels provided in an ANEF contour into a lived experience, and the comparisons are often flawed, e.g. “70 db = Passenger car at 60 km/h and 7m distance.”
- The level of noise nuisance is also impacted by the frequency of overhead flights, the difference between experienced ambient noise levels in residential areas and flight events, and whether any respite – if at all – is being afforded to residents. Brisbane Airport and Airservices have created an aviation super highway above Brisbane that provides for no respite whatsoever.
- Lay people do not easily understand the logarithmic units of the decibel measure.

**BFPCA asks that N65 and N60 contours are being produced and published as per the recommendations in the guidelines of the National Airports Safeguarding Framework.**

**We further ask that the noise impacts beyond the small area indicated in the ANEF noise contours are being properly assessed and communicated to the community. We know that there will be severe noise impacts far beyond the airport’s immediate proximity in areas such as Pullenvale, Upper Brookfield, Samford Valley, Mount Cotton. This is partly exacerbated by planes forced to fly lower due to the safety distance required by the SID/STAR ILS flight paths servicing Brisbane Airport as well as the hidden military controlled airspace. BFPCA asks that the lack of information on the extension of Archerfield flight paths, altitudes, noise impacts, frequency of flights, etc. is being urgently rectified.**

## **Air contamination and pollution**

Archerfield Airport is being used by many older aircraft including propeller and piston engine aircraft that operate on leaded aviation gasoline.

There is a well-established body of peer-reviewed scientific literature on the severe negative impacts of aircraft emissions on human health and wellbeing in the proximity of airports. We have included below a small selection but there are many more. Air contamination and pollution from Archerfield

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<sup>6</sup> <https://bfpca.org.au/duped/> and <https://bfpca.org.au/ano-report/>

Airport's operations are a serious concern for the community, and it is disappointing to see that the Master Plan remains silent on the issue.

- Zahran, S., Keyes, C., & Lanphear, B. (2023). Leaded aviation gasoline exposure risk and child blood lead levels. *PNAS Nexus*, 2(1), gac285.  
<https://doi.org/10.1093/pnasnexus/pgac285>
- Zhang, X., Chen, X., & Wang, J. (2019). A number-based inventory of size-resolved black carbon particle emissions by global civil aviation. *Nature Communications*, 10(1), 534.  
<https://doi.org/10.1038/s41467-019-08491-9>
- Habre, R., Zhou, H., Eckel, S. P., Enebish, T., Fruin, S., Bastain, T., Rappaport, E., & Gilliland, F. (2018). Short-term effects of airport-associated ultrafine particle exposure on lung function and inflammation in adults with asthma. *Environment International*, 118, 48–59.  
<https://doi.org/10.1016/j.envint.2018.05.031>
- Keuken, M. P., Moerman, M., Zandveld, P., Henzing, J. S., & Hoek, G. (2015). Total and size-resolved particle number and black carbon concentrations in urban areas near Schiphol airport (the Netherlands). *Atmospheric Environment*, 104, 132–142.  
<https://doi.org/10.1016/j.atmosenv.2015.01.015>

**BFPCA asks that proper measurements are being conducted by independent academics, and we recommend Archerfield Airport Corporation engages Distinguished Professor Lidia Morawska<sup>7</sup> at Queensland University of Technology for this purpose. She is the director of the International Laboratory for Air Quality and Health (ILAQH) at QUT, a World Health Organization (WHO) Collaborating Centre on Air Quality and Health. This needs to be coupled with air pollution reduction and mitigation measures.**

## Innovation talk and technological solutionism

The Archerfield Airport Preliminary Draft Master Plan (2022-2042) contains suggestions that technology will eventually 'fix' the problem of noise pollution and environmental damage causing climate change. Examples:

§6.2.1

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<sup>7</sup> <https://www.qut.edu.au/about/our-people/academic-profiles/l.morawska>



*“It is expected that, consistent with trends around the world, as newer models replace old aircraft there will be an improvement in reduced operating noise and fuel consumption.” (p. 87)*

#### §9.4.2

*“The aircraft fleet will progressively be modernised over the next 20 years, and the ANEF reflects the noise emissions from newer aircraft that are currently available.” (p. 111)*

BFPCA expresses our concern with this strategy of “innovation talk” that is akin to “technological solutionism.”<sup>8</sup> In a study of the Royal Schiphol Group in Amsterdam, Verdel (2021)<sup>9</sup> found similarly that:

*“Schiphol and the state are continuously pushing the narrative of innovation. The rhetoric of ‘innovation is the key to success’ is used very frequently in the discussion about how to bring aviation back into balance with nature and the living environment around Schiphol. Innovation in the field of noise and emissions is constantly being talked about and presented as the sole solution. [...] This win-win rhetoric between growth and the fight against climate change and noise pollution thus implies not so much a wilful blindness, but rather an instrumental belief in the miraculous power of low-emission technologies and quieter aircraft to save the world **without reducing the number of aircraft movements or regulating the air traffic markets** (Rajak 2020).*

*These promises of innovations, which will probably take decades (if they materialise at all) to come true, is a form of social engineering that I refer to as ‘innovation talk’. The constant talk about innovation – both in terms of noise and emissions – legitimizes the Schiphol policy, which is **only aimed at more growth and more flying**.” (pp. 30-31, emphases added)*

Stay-Grounded is a people-powered, science-based, and action-oriented network of more than 190 member initiatives around the world. The network fosters mutual support and exchange of experiences, and campaigns for a reduction of aviation and its negative impacts, as well as against problematic climate strategies like offsetting emissions and biofuels. Stay-Grounded have produced a series of fact sheets<sup>10</sup> that debunk the greenwashing strategies being employed by the aviation industry. They include:

- Efficiency
- Electric Flight

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<sup>8</sup> Morozov, E. (2014). *To Save Everything, Click Here: The Folly of Technological Solutionism*. PublicAffairs.

<sup>9</sup> Verdel, R. (2021). *In the shadow of the corporate state: An ethnographic study of the shifting dynamics of the corporate state in the vicinity of Schiphol Airport (the Netherlands) through the exploration of counter-citizenship* [Masters Thesis, Utrecht University]. <https://studenttheses.uu.nl/handle/20.500.12932/169>

<sup>10</sup> <https://stay-grounded.org/greenwashing/>

- Hydrogen
- Biofuels
- E-fuels
- Net Zero

**BFPCA asks that Archerfield Airport Corporation and stakeholders review these materials and refrain from any further social engineering, innovation talk, technological solutionism, and instead embrace regulation and reduction measures as a means of obtaining a social licence to operate the airport.**

## Air taxis and drones

The Draft Master Plan suggests, “Archerfield Airport is positioned to become a base for new and emerging aviation technology (including on demand services)” (p. 80). BFPCA is concerned about the prospect of the already congested Brisbane aerodrome being subjected to air taxis and on-demand drone deliveries. The experience of the Logan City community from exposure to drone delivery service trials by provider Wing suggests that the additional noise pollution is unacceptable.

We refer to our detailed submission to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts in response to their call for feedback on “infrastructure planning guidelines to support the safe and consistent integration of drone delivery services in the community.”<sup>11</sup>

**BFPCA asks for an immediate moratorium on all planning and rollout of air taxis and drones until such time that the noise and environmental impact on the community has been ascertained and a social licence to operate has been obtained from affected neighbourhood communities.**

## BFPCA demands

In addition to the above comments and suggestions, BFPCA continues to advocate for eight key community demands to be met and implemented. We extend four of these to Archerfield Airport as follows:

### Long-Term Operating Plan

BFPCA demands that the Minister for Transport issues 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 Airspace Long-Term Operating Plan (LTOP) to better manage the aircraft noise associated with the

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<sup>11</sup> <https://bfpca.org.au/drones/>



Brisbane airspace, including Archerfield Airport. The LTOP is to ensure that aircraft movements are maximised over water and non-residential land.

### **Curfew**

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

### **Airport Capacity Declaration**

The projected growth (Chapter 5) is not in keeping with community expectations. BFPCA demands that the Minister issue an Airport Capacity Declaration for Archerfield Airport to cap the capacity at levels experienced on average between 2010 and 2019 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.

### **Collect Aircraft Noise Levies**

BFPCA demand that the Minister declares Archerfield 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 Archerfield Airport's flight paths and within the noise contours associated with compromised health and educational outcomes.

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