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The Hon Catherine King MP

Minister for Infrastructure, Transport, Regional Development and Local Government
PO Box 6022
House of Representatives, Parliament House
Canberra ACT 2600
via email: Minister.King@mo.infrastructure.gov.au

Brisbane, 23 Feb 2026

Brisbane Airport Corporation – Draft 2026 Master Plan

Dear Minister,

We write regarding the Draft 2026 Brisbane Airport Master Plan currently under your consideration.

BFPCA acknowledges that the Master Plan is a strategic planning document under the *Airports Act 1996* and that responsibility for air traffic management rests with Airservices Australia. However, the Draft Plan includes forecast aircraft noise modelling that indicates material exposure of residential communities to N60, N65 and N70 event thresholds under the National Airports Safeguarding Framework (NASF).

In light of this modelling, we respectfully seek clarification on several procedural matters prior to any decision whether to approve or reject the Master Plan.

1. Application of Airservices' Environmental Change Criteria

Airservices' National Operating Standard *Environmental Management of Changes to Aircraft Operations* (AA-NOS-ENV-2.100, v19) establishes quantitative criteria for identifying potential "significant impact" under the EPBC Act, including:

- N70 (24 hr) ≥ 5 events
- N60 (24 hr) ≥ 10 events
- Night N60 ≥ 2 events

and

- A >20% increase from the existing operational situation.

Given that the Draft Master Plan's alternate metrics maps indicate exposure levels in some areas above these absolute N-metric thresholds, we seek clarification as to:

- Whether any operational changes associated with increased runway utilisation or traffic redistribution have been assessed against Appendix B of AA-NOS-ENV-2.100;
- What baseline was used in determining the “existing situation” comparator for any percentage-increase analysis;
- Whether the operational levels that constitute the current “existing situation” baseline were themselves implemented following assessment in accordance with AA-NOS-ENV-2.100, including any required Community Sensitivity Analysis, Environmental Impact Assessment, or EPBC referral consideration; and
- Whether the criteria for seeking advice under Sections 28 or 160 of the EPBC Act were formally considered.

We also seek clarification as to whether the alternate N-metric modelling presented in the Master Plan was reviewed or endorsed by Airservices Australia, or independently verified for consistency with the modelling assumptions used for ANEF endorsement.

We recognise that the existence of forecast noise contours alone does not automatically trigger referral requirements. However, where forecast growth or redistribution of movements could meet both the absolute and percentage criteria, confirmation of the assessment pathway would assist in assuring the community that procedural safeguards have been applied.

2. Relationship Between Master Plan Forecasts and Prior Environmental Assessment

The 2007 EIS established the environmental assessment envelope associated with the New Parallel Runway. The Draft Master Plan forecasts traffic volumes and utilisation patterns beyond those earlier projections.

We respectfully request clarification as to:

- Whether Airservices has undertaken a “gap analysis” (as referenced in AA-NOS-ENV-2.100) in relation to previously endorsed EIS metrics;
- Whether all flight paths currently in operation – including those geographically within areas previously assessed under the 2007 EIS – were re-evaluated using current assessment metrics when preparing inputs to the 2026 ANEF; and
- Whether any changes in runway mode use, traffic distribution, or movement volumes have been considered to constitute a discrete operational change requiring fresh environmental assessment.

We further request clarification on the relationship between the 2026 ANEF inputs and the planned TRAX airspace redesign scheduled for later in 2026, including whether the ANEF is expected to be superseded and what update mechanism would apply in that event.

We do not suggest that a Master Plan forecast itself constitutes an operational change. However, if forecast utilisation patterns are materially different from those previously assessed, confirmation of the reassessment pathway would provide procedural transparency.

3. Procedural Assurance Prior to Approval

Given that the Master Plan will frame airport capacity and operational expectations over the coming decade, we respectfully submit that approval would ideally occur only once there is clear assurance that:

- Applicable Airservices environmental change processes have been applied where relevant;
- Any potential EPBC referral triggers have been assessed in accordance with established criteria;
- The relationship between forecast capacity growth and prior environmental approvals has been formally considered; and
- The ANEF modelling inputs remain appropriate in light of planned airspace redesign initiatives.

We would appreciate confirmation of what documentation the Department has obtained in order to satisfy itself on these matters.

Our intention is not to impede strategic planning, but to ensure that the environmental governance framework designed to manage aircraft noise growth is demonstrably operating as intended.

BFPCA remains committed to constructive engagement and would welcome the opportunity to meet with your Department to better understand the assessment pathways applied.

We appreciate your careful consideration of these procedural matters.

Yours sincerely,



Prof. Marcus Foth

Chair, Brisbane Flight Path Community Alliance, Inc.