



Brisbane Flight Path Community Alliance
c/o David Diamond, Chair

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Jason Harfield

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13 April 2021

Dear Mr Harfield

I am writing to you on behalf of Brisbane Flight Path Community Alliance (BFPCA), representing a large group of Brisbane communities adversely affected by Brisbane Airport's flight paths – including noise pollution and human health impacts.

Since Brisbane Airport's New Parallel Runway (NPR) and new flight paths commenced operation in July 2020, there has been a severe increase in noise pollution and health impacts on thousands of people and many communities in Brisbane.

BFPCA recognises that aviation is vital for a modern city and crucial for economic prosperity and we acknowledge the significant role of the aviation industry for Brisbane and Queensland communities. However, communities have the right to the quiet enjoyment of their neighbourhoods free from preventable, excessive, unsustainable and unmitigated aircraft noise pollution.

BFPCA, in follow up to numerous complaints from its members, and also in response to the ongoing investigation by the Aircraft Noise Ombudsman, conducted its own review of the NPR community consultation process focussing on the 2006/2007 Environmental Impact Statement (EIS). It also surveyed the local impacted communities.

The Issues

The results are extremely troubling from a resident's viewpoint, and we believe should also be of significant concern to Airservices Australia's (ASA) leadership. They demonstrate systemic and fundamental failure of governance by Brisbane Airport Corporation (BAC), who have engaged the community with inaccurate and misleading information over an extended period of time. In particular, the review concluded that there were significant deficiencies across critical aspects of the 2006/2007 EIS process that have denied residents the opportunity of good faith consultation:

- BAC and ASA failed to achieve a social license to operate for the NPR and its flight paths due to its flawed and inadequate community engagement methodology. The methodology ignored the linear aspects of the new infrastructure (flight paths) and relied on indirect and low impact engagement



tactics, which failed to adequately reach impacted residents outside a five-kilometre radius of the airport.

- It used significantly understated noise forecasts in community consultation and the EIS, which effectively concealed the full impact of the project.
- The process insufficiently assessed the adverse health and welfare impacts on affected communities caused by the airspace design, and failed to properly consider how these impacts could be mitigated.
- Critical key noise information regarding over the bay operations, flight frequencies, noise contours, and flight path locations were communicated in a misleading and complex manner that further limited the community's understanding.
- Neither BAC nor ASA presented any viable airspace design alternatives with significantly different noise profiles for the community to consider and challenge. The over-riding objective of BAC appeared to be the maximisation of operational capacity and flexibility without regard to alternatives that might reduce impact on the community. We believe that ASA has failed our local communities due to its support of BAC achieving this outcome.

As a result, the development has delivered an acute and unreasonable noise impact well beyond levels anticipated by the community. BFPCA considers the integrity of the EIS community consultation and associated airspace design process has been fundamentally compromised. Between 2007 and 2020 there were multiple opportunities for ASA to mitigate the deficiencies in the EIS and clearly communicate the full extent of expected noise impact. Unfortunately, even today, the information available to residents about the noise levels from the NPR and new flight paths is woefully inadequate and inaccurate. The effect is to disempower the community through inadequate procedural fairness, and the outcome is a sense of disbelief, shock, and anger in the impacted communities.

Community Survey Results

In order to understand further the impacts of this flawed process on residents, BFPCA conducted a survey over the Christmas four-week holiday period in 2020/2021. We received more than 2,000 responses from impacted Brisbane households. Interestingly, BAC's well-resourced EIS secured only 350 from impacted communities.

The survey results reveal the true and significant extent of human impact generated by aircraft noise pollution since July 2020. The survey shows 91 per cent of respondents impacted by flight path noise were not prepared for the number of planes that now fly right above them and 81 per cent of respondents indicated they were not engaged by BAC during its community consultation. Also 78 per cent of respondents said they thought the information and advice received was not transparent nor accurate. Extremely worrying is that 68 per cent of respondents said they suffer some level of mental distress (view the full survey report at <https://bfpca.org.au/community-survey/>).

These results are damning from two perspectives:

- The scale of response to BFPCA's survey compared to BAC's EIS submissions reflects the failure of the community engagement for the NPR and new flight paths to properly communicate the true impacts of the then proposed infrastructure to the community. The engagement effectively lulled our communities into a false sense of security as to the promised minimal impact on our suburbs, which was and is still being heavily promoted. The deficiencies outlined above have denied affected community members the opportunity to be fully informed with accurate and transparent information in order to assess the development. Had the community been properly consulted and fully understood the implications of an aviation super-highway over the most densely populated region of South-East

Queensland, it is reasonable to conclude the EIS public engagement process would have produced a radically different outcome.

- More alarmingly are the extreme human costs this project has had on trusting Brisbane residents. The adverse impacts on people's health, well-being, employment, financial position, and personal relationships are profound and real. Mental health, family stress, medical attention and financial impacts are extremely concerning at this current level, notwithstanding lacking the full extent of regular aircraft traffic and noise due to COVID 19 restrictions. When travel normality returns, these unacceptable impacts will be exponential. There is also no reliable data as to what it will mean over the next 10, 20 and 30 years for Brisbane residents under the flight paths.

It is evident that BAC and Airservices have effectively treated community concerns and livelihoods as commercial collateral damage of the NPR development. The current airspace design operating procedures maximises operating capacity and the commercial value of the infrastructure asset without any meaningful consideration to impacted communities. In effect, BAC has created wealth at the expense of impacted residents who are suffering significant loss in terms of the health, social environment and personal economic outcomes – this represents a wealth transfer from the communities of Brisbane to BAC. Unfortunately, ASA is an organisation that the impacted communities had placed their trust in to safeguard rights of the citizens 'on the ground' including health and welfare during the airspace design and operations. It appears that this trust was misplaced and the priority for AsA is actually the air operations.

Call for Action

Brisbane is the host city for the airport infrastructure, and it is clear the development has not earned a social license to operate. Furthermore, operating data since NPR opening clearly demonstrates that actual noise levels are expected to exceed EIS estimates by more than the 'significant impact' thresholds defined in the Airservices National Operating Standard AA-NOS-ENV-2.100. BFPCA asserts this effectively represents a trigger for a new environmental impact assessment and reassessment of the airspace design.

We request ASA leadership urgently redress the situation and provide a clear plan to reduce the noise impact on the community who have been misled and inadequately consulted. This should include as a minimum:

- Correction and re-issue of the misleading and inaccurate noise forecasts and community impact assessments provided during the EIS;
- Urgent development and implementation of a noise improvement plan, which clearly sets out the short and long term changes to the airspace architecture and noise abatement strategies that BAC and Airservices are proposing, with a clear quantification of the expected improvement that align with the expectations of 'minimal impact' to Brisbane residents that BAC has consistently promised over a number of years and in documentation that residents have relied upon in personal decision making.
- Direct engagement by ASA with all severely impacted residents to the best practice standards typically employed by all levels of Australian government for major projects (i.e community members under the new flightpaths), to accurately communicate the expected impact of the NPR on the community and to consult on the noise reduction plan.
- BFPCA requests that a community engagement process is embraced by ASA that meets the International Association of Public Participation's (IAP2) classification of "collaboration", where BAC and Airservices seek to "to partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution."

We seek your urgent and sincere consideration of the serious issues now faced by your host communities resulting from BAC's and ASA's actions over the extended project implementation.



Many communities in Australia and around the world successfully co-exist with high traffic airports, because their impacts have been openly and transparently communicated. The operators have adopted modern noise abatement strategies to protect communities from noise pollution. Our Brisbane communities have a right to the same transparent communication and high-quality noise elimination and abatement strategies.

We believe that the trust afforded to ASA from our Brisbane communities has been broken, and we urge ASA to take the opportunity to rectify these issues and build a long term transparent and open relationship with host communities.

We look forward to your response on the serious health, well-being and lifestyle impacts your organisation's actions have had on several thousand Brisbane families within your host communities.

Regards

A handwritten signature in black ink, appearing to read "D. Diamond".

David Diamond

Chair

Brisbane Flight Path Community Alliance (BFPCA)

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