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To Whom it May Concern

I live over 22kms from Brisbane Airport however the number of flights flying over my home, their frequency and the altitude at which they fly makes it feel as if I live beside the airport. When the parallel runway was mooted for Brisbane information indicated that residents living in the western suburbs, including [REDACTED] would not be adversely affected by aircraft. We were told that planes would take off over Moreton Bay. This is not the case. The list of aircraft below all flew over [REDACTED] and other western suburbs and did not take off over Moreton Bay. Residents in the western suburbs have been mis-led and mis-informed about the parallel runway.

These are the planes that flew over the evening of Tuesday, 28 June 2022:

5.19pm	QF2816	to Moranbah
5.35pm	QF2818	to Moranbah
5.33pm	VA49	to Denpasar
6.19pm	QF1798	to Rockhampton
6.44pm	VA795	to Cairns
6.57pm	JQ906	to Townsville
7.00pm	QF1798	to Rockhampton

7.22pm	QF990	to Mackay
7.26pm	VA1251	to Rockhampton
7.28pm	JQ836	to Proserpine
8.12pm	QF2328	to Bundaberg
8.15pm	VA383	to Townsville
8.26pm	VA621	to Mackay
8.52pm	QF760	to Townsville
10.08pm	QF718	to Cairns
10.19pm	BR316	to Taipei
10.56pm	JQ934	to Cairns
11.08pm	QF15	to Los Angeles
11.12pm	QR899	to Doha

These are the planes that flew over as at Wednesday morning, 29 June 2022:

00.08am	SQ246	to Singapore
6.10am	QQ2230	to Mt Isa
6.14am	QF750	to Townsville
6.17am	QF984	to Mackay
6.22am	QF1076	to Mt Isa
6.24am	QF1794	to Rockhampton
6.29am	JQ928	to Cairns
6.35am	JQ904	to Townsville
7.02am	VA601	to Mackay
7.25am	OD158	to Denpasar
7.29am	JQ888	to Mackay
7.50am	JQ57	to Denpasar
8.58am	QF1224	to Darwin
9.04am	VA367	to Townsville
9.27am	VA1235	to Rockhampton
9.45am	SQ256	to Singapore
9.57am	QF57	to Port Moresby
9.41am	JQ834	to Proserpine
9.45am	QF986	to Mackay
10.10am	QF1796	to Rockhampton
10.20am	QF756	to Townsville
10.40am	PX4	to Port Moresby
10.55am	QF51	to Singapore
11.16am	VA781	to Cairns

and the list goes on. It is bad enough the number of flights going over from 6am onwards but to have six flights between 10pm to 6am is too much. They are all too much. Can you honestly look at the frequency and number of aircraft flowing over [REDACTED] and think that it is acceptable?

The original runway at Brisbane Airport had planes taking off over Moreton Bay. We were told that is what would happen with the parallel runway. That changed. We were then told that planes taking off from the parallel runway would only fly over suburbs on take off under limited reasons such as wind factors. How is it that the wind is constantly blowing in the wrong direction for planes to take off over Moreton Bay on a daily basis now whereas before the second runway we did not have this problem? How is it other planes can take off over Moreton Bay on a daily basis without this problem?

Residents are now having to suffer through debilitating noise and disturbances whilst Trax International have reported 49 issues to be addressed by Airservices. All of these issues were supposed to have been addressed in the planning phase of the parallel runway. If they were addressed in the planning phase they were binned. Airservices say that the identified opportunities made by Trax International range from being able to be readily progressed in the immediate/near term, to those that are complex, require significant stakeholder consultation and safety analysis which will take more time to work through. In the meantime, residents have an aircraft highway over their homes.

In the Airservices quarterly update for the period 24 February 2022 to 23 May 2022 extended simultaneous opposite direction parallel runway operations (SODROPS) enabled aircraft to arrive and depart over Moreton Bay during weekends between the hours of 6am to 8am when safety conditions such as weather and traffic volumes allowed. Airservices says this is the preferred operating mode at night (10pm to 6am) where weather and traffic conditions allow. It can also be used at other times of the day. If that is the case, why can it not be used at all times weather permitting? It would seem negative factors were at play during this period as nothing changed regarding the planes flying overhead.

Airservices have also said that an increase of 156 nautical miles in distance was travelled for flights using SODROPS during the trial period and an increase of 927kg Co2 emissions. Airservices should have planned better in the planning phase if this is the case or did they always intend to change the flight paths and not tell anyone?

In the Brisbane New Parallel Runway Flight Paths Post Implementation Review Independent Assurance Interim Report Ver. 1 March 2002 (PIR) it states:

“... that although technically viable, some of the potential opportunities may not prove to be operationally feasible or sufficiently beneficial in the context of the overall approach to improving the airspace and the trade-offs with other important areas of performance such as; the long term capacity of the airport to meet the future demand for aviation; the resilience of the operation to

adverse weather and unplanned events; and the imperative to reduce aircraft emissions in line with Australia's commitment to achieving net-zero targets."

From the above I am worried that nothing will change and, again, proper initial planning in relation to the issues above were not addressed in the in the planning stages of the parallel runway.

The PIR further states:

"The availability of specialist resources and the rate and scale of change that the Brisbane operation can safely accommodate are important limiting factors on how many opportunities can be developed and implemented in a given timeframe."

Again, I feel from the above nothing will change and Airservices will not try to change anything.

At page 19 of the PIR it states:

"From the period August 2020 to January 2022, the parallel runways were operated in three main modes:
. 19 operations:
...
Departures to the North from the new runway (19R) over the city and departures to the South from the legacy runway (19L) over the city."

These departures went over the city then went over the western suburbs.

It then continued:

"Departures to the North over the bay from the new runway (01L) and departures to the South over the bay from the legacy runway (01R) ... SODPROPS: Simultaneous Opposite Direction Parallel Runway Operations, enabling arrivals and departures to operate simultaneously over the bay. This was the most common mode during the night-time period."

Why just have SODPROPS during night-time periods? Please have all flights going over the Bay.

On page 10 of the PIR to was acknowledged that complaints highlighted the community's general expectation that the New Parallel Runway (NPR) would lead to much a much larger share of Brisbane air traffic arriving and departing

simultaneously over water and their concerns that noise impacts in the city and surrounding suburbs were greater than expected.

On page 12 of the PIR at point 25 it states:

“The proportion of total flights that operate simultaneously over water is determined by how the parallel runways are used together. ATC at airports with parallel runways typically direct inbound and outbound flights to arrive and depart in the same direction. At Brisbane Airport, this means, when inbound flights arrive over water, outbound flights depart in the same direction over the city. Similarly, when flights arrive over the city they depart over the water. The impacts of aircraft noise arising from Brisbane operations reduces significantly when arrivals and departures operate simultaneously, in opposite directions, over the water, using a runway mode known as SODPROPS”.

Well this SODPROPS method is what Brisbane residents thought would be happening with a parallel runway. Airservices did not make any of the above clear in any information provided.

Further, at point 26 it states:

“The EIS considered SODPROPS the preferred runway mode for operations when meteorological and capacity conditions permit. To maintain high standards of safety, simultaneous opposite direction operations can only be used when the weather is relatively calm and the flow of inbound and outbound flights is reasonably light. There is a clear expectation in the EIS that these conditions would mainly arise during the nighttime, early morning and late evening periods and that SODPROPS is a low to medium capacity mode.”

Again, this was not the information that residents were given when the proposed NPR was first mooted. Most residents were not aware that the SODPROPS method would be a low to medium capacity mode reliant on weather conditions and used during night time, early morning and late evening periods. As of now, from the flight departures given above, that is clearly not happening.

The points given in Table 1 at point 27 on page 12 of the PIR should have been considered in the initial planning of the NPR and not now, after the fact. If these points had been considered surely we would not be in the situation we are now. It is apparent the SODPROPS method will not be used full-time due to the increased number of in-bound and out-bound flights which again should have been factored in when considering a NPR.

At point 47 on page 18 it is stated that the airspace interactions between the routes at higher altitudes that serve Brisbane airport and traffic transiting across the region seem to create interdependences that may limit the application of SODPROS, especially during the day time. Why wasn't this factored in during the planning stages of the NPR?

At point 49 it is stated that traffic inbound from the West is restricted when the larger portion of segregated airspace, known as Big Amberley, which is reserved for military operations from Amberley airfield, is activated. Again, why wasn't this factored into the initial plans?

On page 19 at point 50 it says that the Brisbane terminal airspace structure and route network are reasonably complex with route interactions and crossing traffic. The complexity of the ATC tasks for TCU controllers seems to increase further when SODPROS are used in the current NPR airspace design. Well how did any of these plans pass the initial planning stages if this is the case and why would SODPROS have been the "preferred method" if this is the case?

At point 52 on page 20 it says that some local communities experienced comparatively quieter skies due to extensive travel restrictions imposed during COVID 19 and are pushing for nearer-term improvements that may retain some peace and tranquility as air travel recovers. This is not the case for [REDACTED]. I have been living in the area for the past 16 years and we never had the air traffic we see, hear and feel now. We never had flight paths over our suburb. We had planes fly over but nothing at all like we have now since the NPR began operations. In [REDACTED] we are used to peace and tranquility and lush green areas to enjoy and listening to children playing not a constant fly zone.

The optimisation of flight paths, especially at lower altitudes, remains a relatively untapped opportunity to deliver further improvements is stated at point 53 on page 20. I believe this is what is happening now. As I've said, we had planes fly over but at much high altitudes and less frequently. Now they appear to fly at lower altitude more regularly thus causes so much disruption.

At point 98 on page 34 it says that the existing NPR airspace design does not allow for noise respite operations for outbound traffic on departure from Brisbane Airport. If this is the case, again, how on earth did these plans get approved? Again, residents in the areas around [REDACTED] were never told about this issue.

There is currently no long-term plan to optimise the performance of the Brisbane operations from a noise management perspective as traffic levels recover and continue to grow it says at point 100 on page 34. Looking at the frequency and number of flights currently as per my listings above, I am taken aback by this. I certainly hope that the number of flights will not increase and I hope that noise

management will be put in place sooner rather than later. However, further reading of this report indicates things will only get worse. Again, no-one in my area had any idea that this would be the case.

On page 43 at point 135 it mentions the environmental impacts of overflight at lower altitudes that should be considered include the impacts on areas prized for their heritage, tranquility or natural beauty. [REDACTED] is on the doorstep of Mt Coot-tha. Mt Coot-tha is a Brisbane icon forming a backdrop for the city and is Brisbane City Council's largest natural area. It contains more than 1600 hectares of open eucalypt forest, rainforest gullies and creek lines. That being the case, how is it that aircraft are allowed to flow at low altitude over this area that is tranquil and of natural beauty?

It also states that impacts of overflight at lower altitudes that should be considered on areas that are densely populated residential properties and rural areas with comparatively lower levels of ambient noise. That is what [REDACTED] is and the suburbs out to Pullenvale that also suffer now.

I hope that Airservices puts the communities first and the months of reporting and reviewing are not just "lip service" to try and satisfy community disharmony due to their lack of forethought. It appears that Airservices did not engage with communities enough prior to the NPR being put through and I fear that Airservices will do little to actually implement and solve the problems residents are currently feeling. Again, looking at the flights I have listed there is a problem.

Therefore below are suggestions to improve this situation:

1. The need for legislative and regulatory overhaul of the *Air Services Act 1995* to achieve true regulatory independence, to eliminate actual, possible or perceived regulatory/state capture, a broader scope for consideration of contemporary factors (eg climate change, social licence to operate) that will affect future airport and flight path design and operations, rather than the current limited focus on safety, efficiency and private industry profits;
2. The need for standard criteria across all capital and regional airports regarding the specification and adoption of curfews, flight movement caps and airport capacity declarations as provided under the *Airports Act 1996*, S. 195;
3. International best practice and genuine community engagement processes and impact reporting by qualified, independent experts across all jurisdictions regarding planned and on-going airport operations; and

4. Stronger and evidence based consideration of all issues of the impacts of aircraft noise and other pollution on mental and physical health and the role of strong regulation to achieve net aircraft noise pollution reductions.

Yours faithfully,



Susie Soong