



13 June 2024

## Submission to GC Airport Preliminary Draft Master Plan 2024

I write for and on behalf of the Gold Coast Lifestyle Assoc Inc (Association). This is our submission to the Gold Coast Airport Preliminary Draft Master Plan 2024 (**Draft Master Plan**). We respectfully request that Gold Coast Airport P/L (**GAPL**) make amendments that address the issues identified in our submission and incorporate those amendments into the Draft Master Plan to be presented to the Federal Minister for approval.

### 1.0 Overarching comments on Draft Master Plan

The Draft Master Plan should not be approved by the Minister in its current form because it does not comply with the *Airports Act 1996* (Cth) (**Airports Act**). Specific instances of non-compliance are identified under the sub-headings in the text of this submission below.

As a document for public comment the Draft Master Plan should be drafted in an explanatory, plain English style when conveying the implications of technical subject matter, such as noise metrics and changing noise contours, so that this technical information can be clearly understood by members of the public. Regrettably, this has not happened in the Draft Master Plan, as is evident by *Section 7 Aircraft noise and safeguarding* being far shorter than the equivalent section in the 2017 Master Plan.

This submission also identifies examples of several unsubstantiated statements and information gaps regarding key issues of high public interest. Noting that the community gets only one opportunity to comment on the Draft Master Plan, it is unfortunate, and frankly disappointing, that these instances of inadequate disclosure have not been picked up and remedied by the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (**Department**) in their written comments on the exposure draft referred to on page 279.

Taking these factors into account, the public has not been afforded a fair and reasonable opportunity to understand what implications arise from the Master Plan, for example in relation to increased noise pollution from increased RPT flight numbers or with the proposed relocation of the Runway 32 landing threshold. These flaws need to be remedied in the Draft Master Plan to be presented to the Federal Minister.

### 2.0 Specific issues

#### 2.1 Lack of clarity regarding increased RPT flight numbers

While the increase in passenger numbers over 20 years is highlighted and easy to find at pp72-75, the text detailing the proposed increase in RPT flights is not. This vital information is buried and obscured on p194 under the heading 7.2.3 Noise Contours. We ask that this information be given its own specific, new section heading following 3.2.3.1. While the graph splitting forecast

growth into domestic and international RPT movements is useful, there must also be a statement about the combined total number of RPT movements at Ultimate Practical Capacity (UPC). There should also be a clear explanation of the difference between the terms “flights” and “movements”.

## **2.2 Runway length and runway safeguarding**

The following text at p126 refers:

“An ultimate runway length of up to 2,858 metres continues to be safeguarded. This length is consistent with the length safeguarded under previous Gold Coast Airport Master Plans.”

We are concerned that this statement could easily be misinterpreted that the airport already has an approval in place to extend Runway 14/32 to 2,858 metres. This is not correct, and we refer to the details supplied to the CACG Draft Master Plan early engagement workshop 2 March 2023 by the Tweed District Residents and Ratepayers’ Association that confirms this position (see **Appendix 1**).

Runway extension is a matter of enormous public interest to communities, especially those at the southern/NSW end of the runway. We therefore ask that clarifying text be added to the Draft Master Plan stating that:

- the term safeguarding refers to protecting airspace from obstacle intrusion (not runway extension);
- the airport does not hold an approval to construct an extension to Runway 14/32 to 2,858 metres;
- that any extension must be proposed in a Draft Master Plan, with approval sought from the Federal Minister;
- subject to the above, any approval to construct a runway extension must then be sought through a Major Development Plan under the Airports Act 1996;
- that the UPC projected in this Draft Master Plan is based on the current runway length of 2,492 metres (p 124); and
- that there is no proposal in this Draft Master Plan (which covers the next 20 years) to construct an extension to Runway 14/32.

## **2.3 Runway 32 landing threshold relocation**

The Draft Master Plan (Section 5.4.1.2, pages 126-127) purports to characterise the proposed extension of the length of Runway 32 (to relocate the landing threshold to the south by 300 metres) as not constituting a major airport development and therefore not requiring a Major Development Plan (MDP).

This is incorrect. The proposed extension of Runway 32 resulting from the relocation of the landing threshold will require a MDP.

Section 89(1)(b) of the Airports Act clearly and unequivocally provides that extending the length of a runway is a major airport development without qualification.

The reasons for this are self-evident. Any practical extension/lengthening of the runway means that it can then be used by bigger aircraft more frequently, with the additional noise impact that this necessarily creates.

This is implicitly acknowledged in the content of this section of the Draft Master Plan when it refers to the current length of the runway having been sufficient for operations to date and how the relocation of the threshold will increase the safety/reliability of take-offs.

The requirement for an MDP is further supported under the provisions of the Department's "Significant Impact on the Local or Regional Community Guide" 2012 ([https://www.infrastructure.gov.au/sites/default/files/migrated/aviation/airport/planning/files/Significant\\_Impact\\_Guide\\_2012.pdf](https://www.infrastructure.gov.au/sites/default/files/migrated/aviation/airport/planning/files/Significant_Impact_Guide_2012.pdf)).

Noting the above, the Draft Master Plan does not meet the requirements of the Airports Act, including pursuant to section 71(2)(a), because it does not accurately represent, and is likely to be misleading with respect to, or evinces an intention by the GCAPL to pursue its development objectives for the airport in a manner that does not to comply with the obligations of the GCAPL under the Airports Act.

The text suggesting that a MDP is not required should be removed and replaced with a statement that a MDP will be required.

#### **2.4 ANEF and N60/70 maps inadequately represent ILS flight path noise impacts**

Use of the ILS flight path in periods of bad weather and for other reasons continues to be a source of noise complaints to Airservices Australia and remains an issue of high public interest. The adverse impacts of the ILS flight path will increase as RPT flight numbers increase. The ANEF and N60/70 contour maps presented at pages 196-199 do not provide sufficient or adequate disclosure to the community on these escalating noise impacts. The average citizen viewing these maps may well incorrectly conclude that there is no impact from the ILS flight path with the map contours apparently extending no further north than Burleigh Headland.

In stark contrast the far better-quality noise contour maps in the GCAPL ILS MDP (see **Attachment 1**, copy of Section 6.0 from the ILS MDP) provide a much clearer insight into ILS flight path noise impacts. The LA<sub>max</sub> metric is used and depicts the LA<sub>max</sub> 60 zone extending over Surfers Paradise to Labrador (Figures 6.3 and 6.4). The implication for these areas at Ultimate Practical Capacity is that on bad weather days when the ILS flight path is activated for most of the day residents and visitors can expect over 200 flights overhead at around 60dBA, sufficient to interrupt conversations. The N60 contour map in Section 6.0 of the ILS MDP with 10% projected ILS use (Figure 6.6) also depicts the extension of the N60 2 event zone over Surfers Paradise to Labrador along the ILS flight path.

Given this context, we question why the draft UPC ANEF at Figure 7.2.7 and the draft UPC N60 at Figure 7.2.10 in the Draft Master Plan do not include contours extending around the ILS flight path over Surfers Paradise to Labrador.

We note that no information appears in the Master Plan on the ILS flight path use figures used to prepare the ANEF and N60/70 contour maps presented at pages 196-199. Again, inclusion of these figures would appropriately provide the public with more complete and adequate disclosure into the future projected noise environment.

It is vital the Draft Master Plan provides sufficient and adequate disclosure to the public on these escalating noise impacts from the ILS flight path. Without the inclusion of far better-quality noise contour maps similar in standard and content to those published in the GCAPL ILS MDP (**Attachment 1**) the Draft Master Plan does not meet the requirements of the Airports Act, including pursuant to sections 71(2)(d) and 71(2)(da), because it does not accurately represent,

and is likely to be misleading with respect to, the extent of aircraft noise that will be experienced along the ILS flight path.

## **2.5 Substantial expansion of noise event zones**

Under the Draft Master Plan, the GCAPL is seeking approval from the Federal Government to its plan to increase the number of passenger jet flights over the long-term from 110/day to 452/day, the airfield's Ultimate Practical Capacity – an increase of 410%. Analysis by the Fingal Head Community Assoc highlights a concerning issue not explained in the text of the Draft Master Plan. The two maps presented at **Appendix 2** from the Draft Master Plan (p199) show the projected expansion of noise event contours associated with this increased number of flights. Arrows, notes, and interpretation comments have been added.

'Number Above' or 'N-contours' are commonly used in Australia to indicate aircraft noise impacts in a manner that is more readily understood by the public.

The N70 contours show the average number of events per day that exceed an outdoor sound level of 70 A-weighted decibels or dB(A). An outdoor sound level of 70 dB(A) roughly correlates to an indoor sound level of 60 dB(A), the range at which conversations are expected to be disrupted. The implication for the public within the substantially expanded Tugun to Banora Point N70 200 event zone is that as the airport reaches UPC their conversations are expected to be interrupted by aircraft noise around 200 times per day (between 6.00am and 11.00pm QLD – the airport operating hours).

Currently the N70 200 event zone is contained largely within the airport lease area. However, the big increase projected in the N70 200 event zone over the coming years is an unacceptable impact on the public's amenity and wellbeing. No additional noise amelioration measures are proposed in the Draft Master Plan to mitigate this impact. This "do nothing" approach is completely inappropriate. If the airport is to be granted the substantial financial benefits of steadily increasing passenger jet flight numbers, then it should be required to implement reasonable noise mitigation measures as a normal cost of the expansion of its business.

No approval should be granted by the Federal government to this Draft Master Plan to increase passenger jet flights by 410% unless the airport be required to implement a robust Noise Abatement Procedure to properly minimise and mitigate the additional noise impact on the affected community.

We also recommend the Federal government act in the public interest and require that the 2024 Master Plan commit to development of a noise amelioration program (fitting or retrofitting of noise proofing insulation, double glazing and air conditioning to affected residential dwellings) in consultation with the community between now and the next Master Plan in 2032. This 8-year period will allow ample time for an appropriate noise amelioration program to be developed and commenced. Any future Master Plans involving increased passenger jet flight numbers after 2032 can then be evaluated in the context of whether the public impacts of additional aircraft noise have been adequately mitigated and whether improvements in aircraft technology and noise reduction allow scope for additional flights without the unacceptable public impacts that are currently projected.

We commend the following statement at p200 of the Draft Master Plan:

"GCAPL, as the operator of Gold Coast Airport, is committed to working collaboratively with Airservices Australia, airlines, government agencies, community representatives

and other relevant stakeholders to manage aircraft noise intrusion generated by Gold Coast Airport and associated impacts on the local community.”

Consistent with this statement it is a reasonable public expectation that GCAPL commits to implementing a robust Noise Abatement Procedure and supports the development of a noise amelioration program in the revised Draft Master Plan it submits to the Federal Minister for approval.

We note the Draft Master Plan ANEF for the Ultimate Practical Capacity has a significantly larger area within the ANEF 25 contour, meaning an expanded area in which the following land uses are deemed unacceptable: residential dwellings (detached houses, home units, flats); caravan parks; nursing homes; hospitals (refer **Appendix 3**). This expansion further reinforces the need for a robust Noise Abatement Procedure and a noise amelioration program to be included in the Draft Master Plan.

## **2.6 No LMax noise contour maps**

It is unfortunate, and disappointing, that the GCAPL has chosen not to include any LMax contour maps in the Draft Master Plan.

LMax contour maps are acknowledged by Airservices Australia as a relevant and helpful representation of noise exposure that will assist the public in their understanding of expected noise events. In contrast to the averaging effect of N contours, LMax contours depict likely sound pressures (dBA) from single events. LMax contour maps were an important part of the GCAPL ILS MDP document (refer **Attachment 1**). The Draft Master Plan needs to include LMax contour maps, particularly to help the public to properly understand expected noise events resulting from the irregular but often high flight numbers on the ILS flight path during periods of bad weather.

## **2.7 Aircraft noise and safeguarding**

Section 7, pp 182-203, refers. The figures depicting Aircraft operations surface (PANS-OPS), key noise contours and flight paths are nowhere near as clear as those in the 2017 Master Plan. All these figures/map must be revised to the style and full-page size of the 2017 Master Plan figures. Crucially, place names must be included in all these revised figures. Currently there are none making it difficult for the public to properly understand what the implications are for their local area/address. This lack of clarity is unacceptable in a document published to gain public comment on the airport’s long-term future development.

We note that none of the flight path figures (pp 192-193) depict the points at which RPT aircraft must be runway aligned and configured for landing under ICAO regulations. We recommend these points be included in the revised full page flight path figures.

We also note there is an error in Figure 7.2.4 - Runway 32 (Origin/Destination South) with the southern departure flight track for Runway 32 not shown. This must be corrected in the revised full page flight path figure.

## **2.8 Monitoring and reporting of aircraft noise**

We are concerned that the noise monitoring section of the Draft Master Plan provides no assurance whatsoever to the public that a comprehensive and adequate noise monitoring program is in place that is commensurate with the current and projected noise footprint of aircraft arrivals and departures. Instead, we find a narrow focus in Section 8.11 on ground-based noise.

As the airport operator, the GCAPL is responsible for the delivery of a proper noise monitoring program. The current form of the program undertaken by Airservices Australia and its monitoring and reporting capacity is inadequate for current aircraft movements (two permanent noise monitors, plus one moveable noise monitor yet to be commissioned), let alone the significant increases proposed in the Draft Master Plan. A key concern is that noise events around the airport may regularly exceed the expected levels depicted in the N60 and N70 event zone maps and that there is no program in place to verify the accuracy of these important contours/zones. The graphic at **Appendix 4** underpins these concerns, with many noise exceedances plotted. While we realise N60/70 and LAmax are different metrics, we are concerned to see records of LAmax events ranging from 79 - 88dBA recorded both within N70 10 and N70 20 zones and beyond these zones.

We therefore submit that an undertaking from GCAPL is needed in the Draft Master Plan to prioritise with Airservices Australia implementing a far more robust, transparent noise monitoring and reporting program that is commensurate with the airport's current and projected noise footprint of aircraft arrivals and departures. The noise monitoring and reporting program must check and validate to the public that the noise maps used in the Airport Master Plan (N60/N70 event zones and LAmax) are accurate or, if not, require revision. The program must be developed in close consultation with the communities around the airport and with the GCA CACG.

## **2.9 Curfew period**

The Draft Master Plan at page 201 states: "There is no change proposed to the existing curfew arrangements as part of the Master Plan." The Association does not support this statement. Our strong view is that the legacy provisions of the Air Navigation (Gold Coast Airport Curfew) Regulations 2018 must be amended to remove the provisions for any freight jet movements during curfew hours. This is a position held by all community group representatives on the CACG. We ask that the following clarifying wording be included in the Draft Master Plan: "There is no change proposed to the existing curfew arrangements as part of the Master Plan, with the exception they be amended to remove the provisions for any freight jet movements during curfew hours."

## **2.10 Unsubstantiated content**

The Draft Master Plan contains many unsubstantiated statements regarding issues of high public interest. For example:

### 2.10.1 Lack of information regarding the proposed the relocation of the landing threshold

The following statement is made in Section 5.4.1.2 at page 127:

*"The proposed relocation of the landing threshold will not significantly change flight paths or levels of aircraft noise and does not significantly impact the community adjacent to the airport."*

As mentioned in section 2.3 above, the proposed extension of the length of Runway 32 (to relocate the landing threshold to the south by 300 metres) is a major airport development pursuant to section 89(1)(b) of the Airports Act and will require a MDP.

That being said, and additionally, the Draft Master Plan does not provide any information at all regarding:

- (i) the extent to which the proposed relocation of the landing threshold will change flight paths or the levels of aircraft noise, or
- (ii) whether the relocation of the landing threshold will facilitate larger aircraft to land and take-off from the airport more frequently, or
- (iii) the criteria and the basis for the GCAPL contention that the relocation of the landing threshold will not *"significantly change flight paths or levels of aircraft noise"* or *"significantly impact the community adjacent to the airport"*.

The above questions must be addressed with detailed information in the Draft Master Plan.

#### 2.10.2 Inadequate community engagement

The following commendable statement is made in Section 4.3 at page 86 as a key objective of GCA: *"Engage authentically with the community to continue to uphold a social licence to operate."*

However, beyond referring to the CACG as a convenient avenue for 'community engagement', the Draft Master Plan does not provide any information regarding any concrete initiatives or any undertaking by the GCAPL to proactively pursue this key objective.

#### 2.10.3 Improper externalising of impacts of airport operations

Much of the content in the Draft Master Plan indicates an expectation by GCAPL that, following any approval of the Draft Master Plan, it will have a mandate and be entitled to have the negative impact of operations at the airport absorbed by the public without any compensation or contribution from GCAPL.

For example:

- (i) Section 5.4.3 at page 136 states that *"GCAPL will continue to work collaboratively with Airservices Australia and support the introduction of new technologies to further improve the reliability of operations at Gold Coast Airport"* which, in circumstances where the ILS is separately indicated as a subsisting flight path for the 20 year planning period of the Draft Master Plan, fails to provide any proper or adequate commitment to using such new technologies to also minimise the adverse impact of aircraft noise on the community (for example, by preferring the 'over the ocean' flight paths and to phase out the 'over the residential area' ILS flight path).
- (ii) the Draft Master Plan does not disclose or provide any information at all regarding the specific flight path(s) that will be used by the forecasted increase of 125,000 *"RPT jet aircraft movements from 2023"* or as a result of the *"greater number of aircraft movements [that] will be concentrated onto the centreline of Runway 14/32"* (see Section 7.2.3 at page 194). For adequate disclosure a table must be provided in the Draft Master Plan of the number of RPT flights projected to be using each of the flight paths on pages 192-193 at Ultimate Practical Capacity.
- (iii) Section 7.2.4 at page 202 states that *"[t]he most effective way of managing aircraft noise impacts is through adopting and implementing appropriate land use policies, development controls and acoustic standards, which requires accurate identification and mapping of localities potentially affected by aircraft noise"*. However, other than *"engag[ing] regularly with both [the City of Gold Coast and Tweed Shire] councils, providing specific advice and assistance to ensure aircraft*

*noise and mitigation measures are appropriately considered and applied within each jurisdiction", the Draft Master Plan fails to provide any proper or adequate recognition or acknowledgment of the costs associated with measures taken by the public to ameliorate and attenuate the adverse impact of increased aircraft noise resulting from the significant expansion of GCAPL's operations at the airport over the 20-year planning period of the Draft Master Plan.*

The abovementioned deficiencies in the Draft Master Plan on these fundamental requirements is critical to, and does not enable, a proper understanding of, or the making of an informed decision with respect to, the extent and likely impact of the operations at the airport over the 20-year planning period of the Draft Master Plan.

Accordingly, the Minister should refuse to approve the Draft Master Plan in its current form pursuant to section 81(2)(b) of the Airports Act.

### **2.11 Ground transport planning omissions**

The Draft Master Plan proposes a major new public transport hub be established with provision for both a light rail station and heavy rail station close to the passenger terminal.

Our Association is very concerned the Draft Master Plan does not include:

1. Any provision of affordable "park and ride" car parking
2. A protected corridor for the heavy rail line on the Airport's leased land.

Specific comments on each of these concerns are detailed below.

#### 2.11.1 No provision of affordable "park and ride" car parking

No provision has been made for affordable "park and ride" car parking for southern Gold Coast and Tweed Shire residents intending to use the light rail station and heavy rail station planned for the Airport (for example for day trips to Southport or to Brisbane city respectively). This is unacceptable in circumstances where it is proposed ratepayers and taxpayers will fund billions of dollars in light and heavy rail infrastructure to the airport.

In return for the substantial benefits the GCAPL receives from this massive public expenditure there must be a reciprocal undertaking by the GCAPL to provide benefits to the public, including adequate, affordable "park and ride" car parking (\$10/day) for residents making day trips on light and heavy rail. This would require the provision of a specific multi-deck car park on airport lease land close to the proposed light and heavy rail stations. This crucial facility is not included in any of the Draft Master Plan site plans (refer Figure 5.3.2, 20-year Precinct Master Plan, pp 116-117, and text regarding light and heavy rail pp152-155).

The Association's concern is that the GCAPL will build other profit-generating facilities on the appropriate site options and preclude forever the provision of a "park and ride" multi-deck, affordable car park on airport lease land close to the proposed light and heavy rail stations.

#### 2.11.2 No protected corridor for heavy rail line on airport land

No protected corridor or alignment for the heavy rail line on the airport leased land has been identified to connect the planned heavy rail station at the airport with the extension of the heavy rail line from Varsity Lakes to the Airport. The Draft Master Plan at page 154 states: "For the purposes of the Gold Coast Airport Master Plan 2024, GCAPL has safeguarded the location for an on-airport Heavy Rail station and assumed the infrastructure would be delivered by the end



of the 20-year Master Plan period (i.e. by 2044). The Master Plan has not shown a preferred corridor or alignment for the Heavy Rail line, noting the corridor will be subject to further review and engagement between GCAPL and the Queensland State Government.”

The GCAPL 20-year Precinct Master Plan in the Draft Master Plan at Figure 5.3.2, pp 116-117 appears to indicate other facilities being established on the potential heavy rail corridor.

The lack of a protected corridor in the Draft Master Plan for heavy rail provision on airport land is an alarming situation as it raises concerns that heavy rail to the airport will never be built.

These two key public transport planning omissions from the Draft Master Plan must be remedied.

To prevent negative, long-term, legacy issues that inhibit the use and uptake of expensive public transport by residents of the southern Gold Coast and northern NSW the Draft Master Plan should not be approved by the Federal Minister unless it clearly provides for:

- Adequate capacity, affordable “park and ride” car parking facilities close to the planned light and heavy rail stations.
- A protected corridor or alignment for the heavy rail line on the airport’s leased land to connect the planned heavy rail station at the airport with the extension of the heavy rail line from Varsity Lakes.

## **2.12 New commercial and retail precinct**

The Draft Master Plan proposes a substantial new commercial and retail precinct between the GC Highway and the terminal building (refer pages 116-121). Developments proposed include:

- New hotel and office building
- New Airport Village (retail, dining, cultural experiences, business tenancies)
- A health and wellness gateway
- A gateway retail and travel centre.

Because of their scale and intensity, these proposed developments warrant closer scrutiny. No indicative information or proposed design principles are provided on building heights, external appearance, articulation, setbacks, site cover, floor areas, tower separation distances, and plans for provision of generous landscaping and deep plant for trees at street level. The renders/artists impressions of the precinct seem attractive but are not supported by text that provides the public with assurance that the GCAPL is intending to deliver high quality, high amenity, built form outcomes with generous landscaping and deep planting at street level that create shady, cool, walkable streets and pathways. The concern is that the absence of specific, written design principles could lead to an uninviting, hot, treeless “concrete jungle” style development of this precinct. In return for the substantial financial benefits to GCAPL of an approval of its plan to develop this precinct, it is reasonable for the Minister to approve the Draft Master Plan only if it includes a binding set of design principles for this precinct that underpin the public interest and community expectations of a high quality, leafy, inviting outcome.

This position is consistent with requirements of Airports Act 1996 Part 5, Division 3, Section 71, (gb) – “in relation to the first 8 years of the master plan — detailed information on the proposed developments in the master plan that are to be used for:

- i. commercial, community, office or retail purposes; or
- ii. for any other purpose that is not related to airport services”

Because the Draft Master Plan content does not meet the requirement for “detailed information on the proposed developments”, the Minister should refuse to approve the Draft Master Plan in its current form.

The Association also notes the concern of the potential economic and social impacts of the proposed large new commercial and retail hub on existing businesses in Coolangatta, Kirra, and Tugun. This is an issue that would normally be addressed in a development application under the Gold Coast City Plan. However, we understand that because the developments are on Commonwealth leased land no such planning evaluation is required.

### **2.13 Road network assessment**

The proposed new commercial and retail precinct developments raise significant questions regarding impacts on traffic, parking and the capacity of local roads and intersections to cope. There is no visibility on the modelling reported to have been undertaken by GCAPL at p 160. Consequently, statements such as “The results indicated that Gold Coast Airport’s internal road network, as proposed in the 2032 Precinct Development Plan (Figure 5.5.4), is forecast to perform acceptably within capacity based on the applied assumptions.” are unsubstantiated. For transparency, it is preferable that the key source document for these summary statements is made available as an appendix in the Draft Master Plan.

Due to the lack of substantiating information, we consider the information supplied in the Draft Master Plan does not meet the requirements of Airports Act 1996 Part 5, Division 3, Section 71, (ga) vi – “the likely effect of the proposed developments in the master plan on the ground transport system and traffic flows at, and surrounding, the airport”.

Accordingly, the Minister should refuse to approve the Draft Master Plan in its current form.

### **2.14 Covered way in The Plaza not fit for purpose**

While the renders of The Plaza at pages 118-121 feature a visually striking covered way we are concerned this design is not fit for purpose regarding protection from the elements. The roof coverage is narrow in places and features apertures for trees. There is a big, unsheltered gap at the terminal end of the roof. These aesthetic treatments should be balanced with the need to protect users from the extremes of the Gold Coast’s sub-tropical weather, particularly driving rain and baking sun. The roof must be redesigned to deliver a fit for purpose, dry, shady covered way that provides good shelter all the way to the terminal building.

### **2.15 Private and public transport travel times map**

We refer to Figure 5.5.4.1, Private and public transport travel times, p 159.

The intent of this figure is commended as this is crucial information for the community to evaluate the adequacy of public transport provision to the airport. However, there are several problems with the inset box (public transport travel times) in this figure:

- it is far too small for easy reading and interpretation. It should be a full page and it should cover a longer length of coastal communities from Coomera to Pottsville.

(Extension of the map coverage may require additional public transport travel time zone(s) to be added, such as 90-minute and possibly 120-minute zones.)

- clear labelling of suburbs/townships must be added so residents can understand the travel time implications for their locality
- there is a confusing lack of contrast between the two blue colours used for the public transport 60 minute and 30-minute zones. These colours should be changed.

## **2.16 Contaminated soil management**

Plans for management of PFAS-contaminated soil, surface water and groundwater are outlined briefly in Section 8.7 Soil Management, pp235-236. The Section title “Soil management” obscures the main purpose of this section, which is about management of contaminated soil. We therefore recommend a clearer section title be used: “Contaminated soil management”.

We commend the inclusion of the statement: “Community interest and concern regarding PFAS contamination at Gold Coast Airport, including frustrations with the timeframe of investigations, is acknowledged by GCAPL.”

The extending timeline for investigations and the delay in commencement of remediation actions remains a serious ongoing concern. A forward indicative timeline for the delivery of investigations, reporting and decision-making on remediation actions should be included in the Draft Master Plan. This will provide some assurance to the public that the PFAS contamination issue is in fact being addressed with a sense of urgency, something that is not evident at present.

## **2.17 Monitoring and reporting on environmental offset areas**

We commend the ongoing commitment to continue implementation of Project LIFT Offset Area Management Plans (p 249) and ask that annual updates be provided to the CACG.

## **2.18 Pathway for public submissions on Draft Master Plans**

We reiterate a concern raised previously on several occasions with the Department regarding the pathway for public submissions on draft Master Plans and Major Development Plans. Currently the applicable airport is responsible under the Airports Act for conducting and receiving all public submissions on draft Master Plans and proposed Major Development Plans, reviewing the submissions received and reporting to the Minister on how these views have been taken into account in the airport’s proposed final Master Plan or Major Development Plan.

This current role of airports creates an obvious and untenable conflict of interest on the part of the airport (being both the applicant and adjudicator for public submissions) that needs to be rectified by way of legislative amendment.

Our recommendation is that Sections 79 and 84A (regarding Master Plans) and 92 and 95A (regarding Major Development Plans) of the Airports Act 1996 (Cth) should be amended to require that all public submissions on draft Master Plans and proposed Major Development Plans be provided directly to the Department.

In closing, and for all of the reasons given in this submission, the Minister should refuse to approve the Draft Master Plan in its current form pursuant to section 81(2)(b) of the Airports Act.

Thank you for your consideration of the issues raised in this submission. Please do contact the undersigned if any further information or clarification is required.

Sincerely,

**John Hicks**  
**President**  
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Hon Karen Andrews MP, Member for McPherson  
Hon Laura Gerber, MP, Member for Currumbin  
Cr Gail O'Neill, Division 14, Council of the City of Gold Coast

## Appendix 1

# GOLD COAST AIRPORT (GCA) - MASTER PLAN (MP) & RUNWAY HISTORY

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### 1.0 Introduction

Following the awarding of the airport lease to Gold Coast Airport Ltd (GCAL) May 1998, GCAL was required to prepare a draft MP in accordance with the Airports Act for approval by the Minister for Transport & Regional Services. GCAL's first MP to be approved was 2001 with subsequent approved MPs 2006, 2011 and the current MP 2017.

### 2.0 GCAL MPs & runway extension

**1999 Draft MP (dMP):** This dMP included the concept of extension of the runway and associated operational areas in two stages to 2500m and 2700m. Following public exhibition of the dMP January 1999 and it being submitted to the Minister May 1999 for consideration the Minister's decision was to refuse the approval of the dMP August 1999 as it was considered ***"...the runway extension cannot be regarded as a sustainable land-use planning concept."*** (24/8/1999)

**2000 Fresh MP (FMP):** With the rejection of the dMP, the Minister directed GCAL to provide a FMP which again included the concept of an extension of runway 14/32 to 2700m. Subsequent to GCAL being granted an extended period for resubmission the FMP was publicly exhibited July 2000 and submitted Sept. 2000. However, the FMP was again rejected by the Minister Dec. 2000 relevant to the runway extension concept (both NSW Local and State governments had opposed the runway extension concept due to environmental and resident amenity impacts 16/8/2000).

**2001 Revised Fresh Master Plan (RFMP):** Following rejection of the FMP December 2000 the Minister directed GCAL to provide a RFMP pursuant to the Airports Act. The **RFMP** retained the concept of a 2500m runway extension and associated operational areas within the airport Commonwealth boundaries and was GCAL's first approved MP 2001.

**Of note:** Relevant to the runway extension concept the approved **RFMP** states under **s.7** (pg.62), ***"The runway 32 threshold should be retained in its present location for noise abatement reasons"***.

Further, under **s.8.5-Noise Mitigation** (pg.76) it states, ***'...limit the number of noise-affected residences by seeking compliance by airlines to a set of agreed flight paths.....seek the extension of the Federal Noise Amelioration Act.....to cover noise amelioration at all Australian Airports...'***

### 3.0 GCA Runway Extension Project-Major Development Plan (MDP)

The runway extension MDP was approved 8/11/2004 and included, ***"The landing thresholds will remain unchanged after the runway extension is constructed, therefore noise levels experienced by the community will remain unchanged."*** (pg.12)

### 4.0 Current GCA MP 2017

This MP states, ***"Consistent with master plans since 1994 and surrounding land use planning, protection is to be maintained for an ultimate runway length of 2,858m."*** (pg.96)

**Of note:** There has been no approved MP with a runway length beyond 2500m, the subject of the first approved MP 2001. Surrounding land-use of both the Gold Coast and Tweed cities which book-end GCA were planned many decades ago around a smaller regional airport (declared a permanent international airport 2000) and do not include land use provisions for an ***ultimate runway length of 2,858***. This matter was a key factor in a court case in recent years where GCA was an objector to a residential subdivision which the proponent won the case re land-use rights. Hence, the above assertion in the MP 2017 is grossly false/misleading.

Further, the MP 2017 proposes relocation of the Runway 32 landing threshold approx. 300m south stating, ***'the proposed relocation of the threshold does not constitute a major airport development'*** (pg.96) which contravenes the provision for noise mitigation of the approved MP 2001 and subsequent Runway Extension MDP, and also provisions of the Airports Act.

## **5.0 Background History of Coolangatta Airport (GCA) draft MPs**

**Provisional MP 1981 (PMP):** December 1981 the Commonwealth Department of Transport prepared a PMP for Coolangatta Airport to provide the basis for planning of the airport to cater for the then forecast traffic, but was not finalised as a consolidated document for the development of the airport.

**FAC Draft MP 1994 (dMP):** Work on the Federal Airports Corporation (FAC) dMP Study commenced in December 1989 with a draft plan compiled in October 1990 but was not concluded.

The dMP was subsequently updated and was released for public comment April 1994. The main elements of development included extension of runway 14/32 southwards to a length of 2890m.

There were significant issues of public concern and the FAC determined that a review of the dMP should be undertaken, with particular regard to aircraft noise impacts on surrounding residential development. In 1996 the FAC commissioned a study to address the issues but this study did not proceed beyond the preliminary draft stage.

## **6.0 Conclusion**

The significant matters of runway extension at GCA is well documented including the need for financing noise amelioration and property buy-up due to the airports land locked location with urban growth of 2 major regional cities and close proximity to developed land with no runway end over water i.e. airport noise from the operations of GCA poses very difficult planning issues and inequitable restraints on land development opportunities and expectations on existing land-use rights. Further, there are significant matters of regulated public safety exclusion areas.

There has been no approved MP with a runway length beyond 2500m. The 2017 MP statement, "Consistent with master plans since 1994 and surrounding land use planning, protection is to be maintained for an ultimate runway length of 2,858m." (pg. 96) is incorrect. Master Plans prior to 2017 do not include land use provisions for an *ultimate runway length of 2,858*.

Any increase of GCA's runway operational length warrants a MDP process in accordance with the Airports Act.

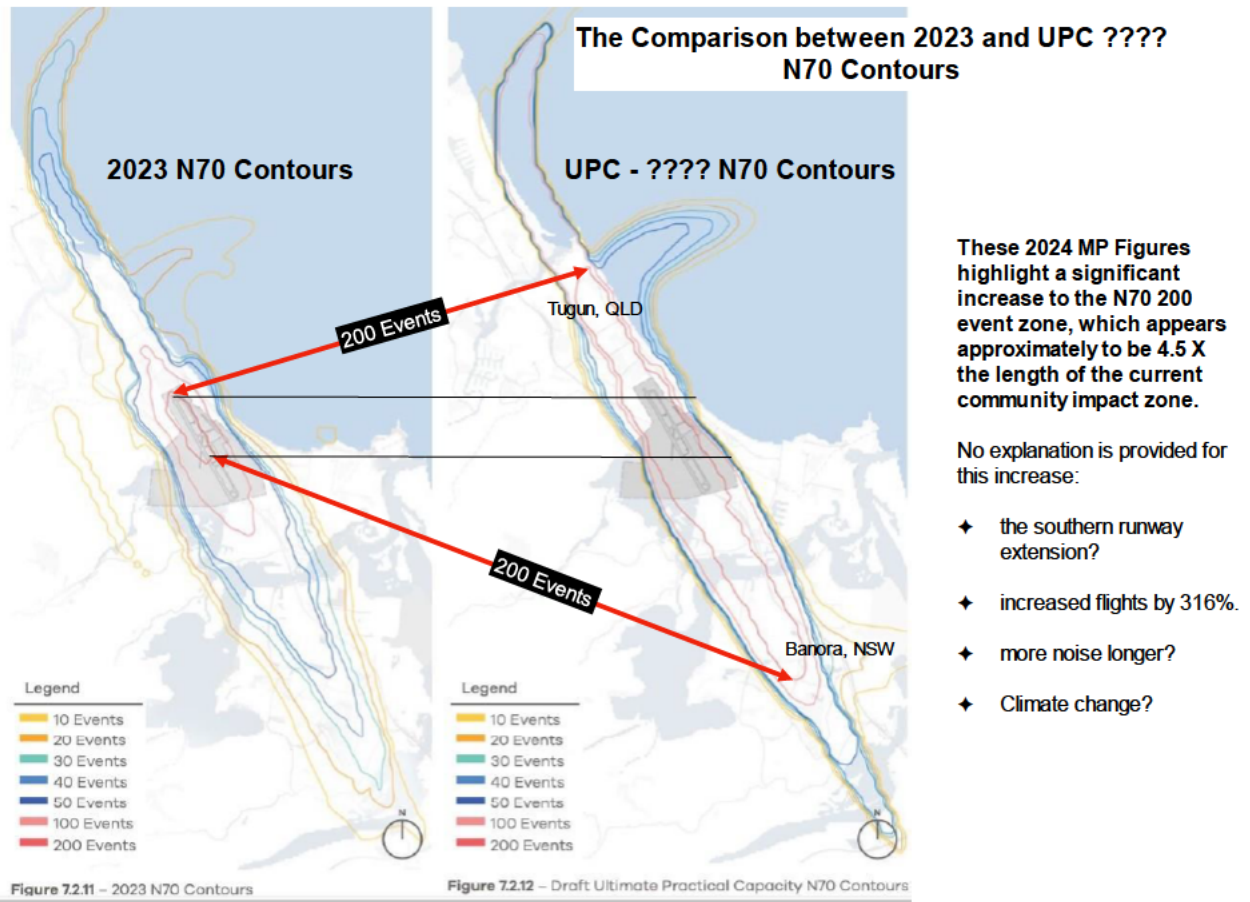
Claims in the GCA MP 2017 that proposed relocation of the landing threshold does not trigger a MDP process are inaccurate. The location of the landing threshold was specifically determined in previous MPs as an important noise abatement measure. Any proposal to relocate it must be evaluated through a rigorous, transparent process that engages the local community. Correction of such erroneous and misleading claims needs to be implemented into the GCA MP 2024.

27/2/23

(Source: Tweed District Residents and Ratepayers' Association)

## Appendix 2

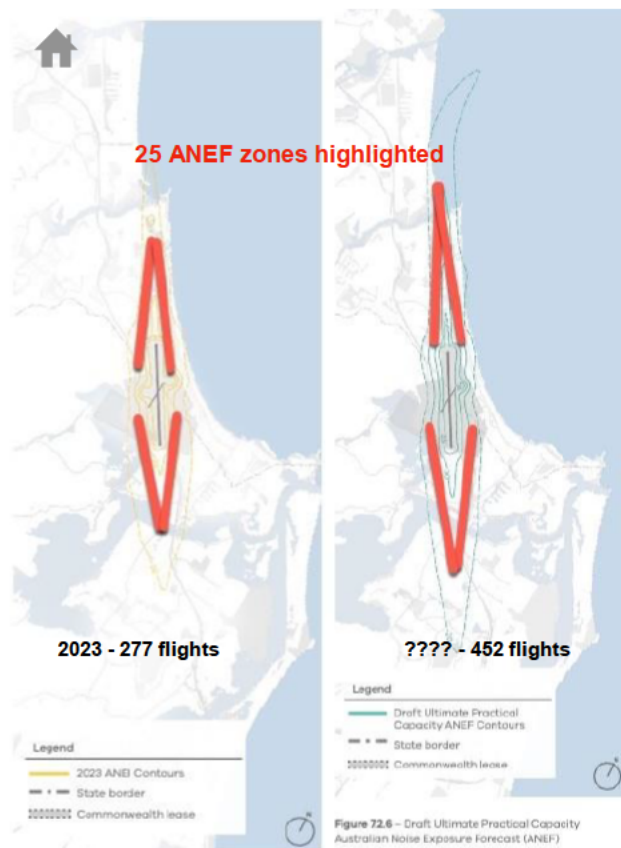
### Projected expansion of noise event contours



Source: Presentation by Larry Woodland, Fingal Head Community Assoc, to GC Airport CACG meeting 9 May 2024.

## Appendix 3

### ANEF 25 zone expansion



### ANEF Comparison between 2023 and UPC ????

Slight normalising of images scale to show the increased affect on Building Site Acceptability.

Buildings > 25 ANEF Unacceptable inside these areas:

- ✦ Houses,
- ✦ home units, flats
- ✦ caravan parks,
- ✦ nursing homes,
- ✦ hospitals.

Note: The 2024 plan ANEF for the Ultimate Practical Capacity (UPC) has a significantly greater building acceptable foot print, even with quieter planes.

Table 2.1 Building Site Acceptability Based on ANEF Zones – AS2021:2015

Building type	ANEF Zone of site		
	Acceptable	Conditionally acceptable	Unacceptable
House, home unit, flat, caravan park	Less than 20 ANEF (Bate 1)	20 to 25 ANEF (Bate 2)	Greater than 25 ANEF
Hotel, motel, hostel	Less than 25 ANEF	25 to 30 ANEF	Greater than 30 ANEF
School, university	Less than 20 ANEF (Bate 1)	20 to 25 ANEF (Bate 2)	Greater than 25 ANEF
Hospital, nursing home	Less than 20 ANEF (Bate 1)	20 to 25 ANEF	Greater than 25 ANEF
Public building	Less than 20 ANEF (Bate 1)	20 to 30 ANEF	Greater than 30 ANEF
Commercial building	Less than 25 ANEF	25 to 35 ANEF	Greater than 35 ANEF
Light industrial	Less than 30 ANEF	30 to 40 ANEF	Greater than 40 ANEF
Other industrial	Acceptable in all ANEF zones		

**Notes:**

1. The actual location of the 20 ANEF contours is difficult to define accurately, mainly because of variation in aircraft flight paths. Because of this, the procedure of Clause 3.3.2 may be followed for building sites outside, or near to, the 20 ANEF contour.
2. Where 20 ANEF to 25 ANEF some people may find that the land is not compatible with residential or educational uses. Land use authorities may consider that the incorporation of noise control features in the construction of residences or schools is appropriate (see also Figure A1 of Appendix A).
3. There will be cases where a building of a particular type will contain spaces used for activities which would generally be ground in a different type of building (e.g. an office in an industrial building). In these cases Table 2.1 should be used to determine site acceptability, but internal design noise issues within the specific spaces should be determined by Table 3.3.
4. This standard does not recommend development in unacceptable areas. However, where the relevant planning authority determines that any development may be necessary within existing built-up areas designated as unacceptable, it is recommended that the following issues should be taken into account when preparing ANEF for noise contouring (see Clause 3.2. For residences, schools, etc., the effect of aircraft noise on outdoor areas associated with the building should be considered).
5. Where cases should new development take place in ground not otherwise unacceptable because such development may impact airport operations.

Source: Presentation by Larry Woodland, Fingal Head Community Assoc, to GC Airport CACG meeting 9 May 2024.



## Appendix 4

### Actual LAMax aircraft noise records



### Actual LAMax Aircraft Noise Results

This 2015 N70 Contours is Figure 5.8 from the GCAMP 2017 and it shows the estimated N70 noise contours calculated by the INM system.

From 2013 a number of fixed site, short term aircraft noise monitoring took place at the sites shown by the red dots.

From 2013, short term aircraft noise monitoring took place at the sites below, highlighted by the red dots. The maximum aircraft noise event recorded for each site is show.

For example:

At Kingscliff High School recorded a maximum aircraft noise event of 79 dBA, far exceeding the 55 dBA indoor design sound levels for school teaching areas.

Source: Presentation by Larry Woodland, Fingal Head Community Assoc, to GC Airport CACG meeting 9 May 2024.