



Airport BUG

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Re: Submission to Productivity Commission re Economic Regulation of Airports

The Commission is seeking feedback on the effectiveness of the current arrangements for the provision and quality of land transport facilities providing access to airports. Active transport (walking and cycling) is an important part of transport linkages for many of the 20,000 people who work at Brisbane Airport.

The *Airports Act 1996* is the legislation governing the regulation of Australian major airports. The objects of this Act include: “(b) to establish a system for the regulation of airports that has due regard to the interests of airport users and the general community”. The Act requires airports to prepare a Masterplan and a Ground Transport Plan which details the facilities for moving people (employees, passengers and other airport users) and freight at the airport; and the linkages between those facilities.

The importance of active transport at the airport is reflected in initiatives in both the 2014 Brisbane Airport Masterplan and Ground Transport plans. The 2014 Brisbane Airport Masterplan commits the Brisbane Airport Corporation to: “maximise connectivity and accessibility” (Ch 12 p.215). Active transport initiatives in the Airport Masterplan include: “Expand the active transport network across the airport”. and “Improve footpaths, aiming to improve pedestrian connectivity between key precincts” (Ch 12. pages 262 and 269). Initiatives for active transport in the Brisbane Airport Ground Transport Plan 2012 include: “encourage employees to use alternative modes” and “enable a mode shift to public transport, walking or cycling”.

Airport BUG has been advocating for active transport users at Brisbane Airport since 2008. We understand that every public transport user is also an active transport user because connections to the public transport stations are often made by walking. We also understand that people want to use active transport at Brisbane Airport for a variety of reasons: to be more sustainable; to incorporate exercise into their daily routine; to save money or sometimes because they have no other transport option. Many of the young people who work at the fast food stores and retail outlets at Brisbane Airport BNE Service Centre, Skygate and the Terminals do not own a car and do not

have a driver's license. These people rely on public and active transport to travel to their employment at Brisbane Airport. Airport BUG believe good provision of active transport is important for equity so that regardless of age, ability or financial circumstances people have options on how to travel to their workplaces at Brisbane Airport.

Public transport services to many airport precincts are poor or non-existent outside normal working hours. The Airtrain runs 5 am to 10 pm so does not suit shift workers who may start or finish outside these hours, the airport transfer bus to and from the terminals to Skygate where the Translink bus stop is located does not run on weekends. Some shiftworkers, especially those in low wage positions will use a bicycle to access their workplaces during the hours public transport is not operating.


Despite our efforts lobbying for active transport connections at Brisbane Airport, there are several precincts at Brisbane Airport where access for people walking and cycling is difficult, dangerous or impossible. This may be due to road design, lack of footpaths, absence of safe road crossings or signs prohibiting access by people walking and cycling. These airport precincts without safe active transport connections are: Banksia Place, The Domestic Terminal, Da Vinci Place, and The General Aviation Precinct where pedestrian access was removed in late 2018. It should be noted that people using private motor vehicles have unimpeded access to all these precincts which contrasts sharply to lack of facilities for those not in a car and raises equity issues.

Da Vinci precinct

The Da Vinci precinct is designated as the logistics and education precinct. Tenants include Aviation Australia, the training facility for airline cabin and ground staff. Aviation Australia students include many overseas students who rely on public transport, cycling and walking to access Aviation Australia.

The 2009 Brisbane Airport Masterplan explains that DaVinci precinct will have cycle and pedestrian links to Lomandra Drive, surrounding airport precincts, and greater Brisbane. At the end of 2018 and the end of the 2014 Brisbane Airport Masterplan period, the Da Vinci precinct is still not connected by any active transport infrastructure. People who walk to Da Vinci precinct must struggle along the rough and unsealed road verge of Lomandra Drive whilst cyclists hug the narrow crumbling edge of the bitumen.


Despite both the 2009 and 2014 Airport Masterplans promising active transport connections to precincts at the airport generally and specifically to the Da Vinci precinct, after a decade we still have no active transport connection to the Da Vinci Precinct at Brisbane Airport. This makes a solid argument against 'light handed regulation' that Airport Corporations enjoy, and a case for more effective oversight and enforcement of airport masterplans by the Federal Government.



6.6.8 Da Vinci

Zoning(s)	Overall Outcomes
Da Vinci precinct includes: <ul style="list-style-type: none"> Special Purpose Centre Mixed Industry and Business 	<p>Da Vinci precinct is dedicated to logistics and aviation/aeronautical education uses. The logistics development will focus around the aircraft apron. The educational areas will have a university campus feel, bold landscape treatments and built form that is reflective of a hi-tech centre for innovation and learning. The education campus is strongly supported by the State Government and currently consists of flight simulators, cabin crew training, aircraft maintenance training facilities, and research and development facilities.</p> <p>Da Vinci includes lecture rooms, offices, workshops, cafes, service orientated facilities, conference facilities and function rooms. The logistics component of the Da Vinci precinct is concentrated around the former International Airport apron and satisfies air cargo and private operator uses. These educational uses will also service the employment needs of tenants in the nearby Aerotech Park precinct providing synergies between the developments.</p> <p>Cycle and pedestrian path links to Lomandra Drive will also facilitate access to surrounding airport precincts and Greater Brisbane.</p> <p>The use of water sensitive urban design initiatives within the streetscapes is set to complement and enhance Da Vinci's publicly accessible open space.</p>

Da Vinci will include lecture rooms and offices in a campus style location (Artist's impression).



Above: Extract from 2009 Brisbane Airport Masterplan for Da Vinci Precinct.



Above: Student's bicycles at Aviation Australia



Above: Cyclist rides on the narrow, broken shoulder of Lomandra Dr.

Considering the demand for walking and cycling to the Da Vinci Precinct, a 10 year delay in connecting active transport infrastructure to the Da Vinci precinct is "not meeting the interests of airport users and the general community" which is the object of the Act. Such an excessive delay illustrates that regulatory oversight at Brisbane Airport has not been effective and supports the case for increased regulation of airports.

Banksia Place

Banksia Place precinct includes the hire car yards and offices, staff car parking, airport traveller car parking and taxi waiting area. Staff working at the terminals can often be seen walking along the side of the road from the staff car parking areas to their workplace. The reasons why people walk can only be guessed – for exercise, for enjoyment or because it is quicker. Airport staff have informed us that if they miss the shuttle bus it is quicker to walk.

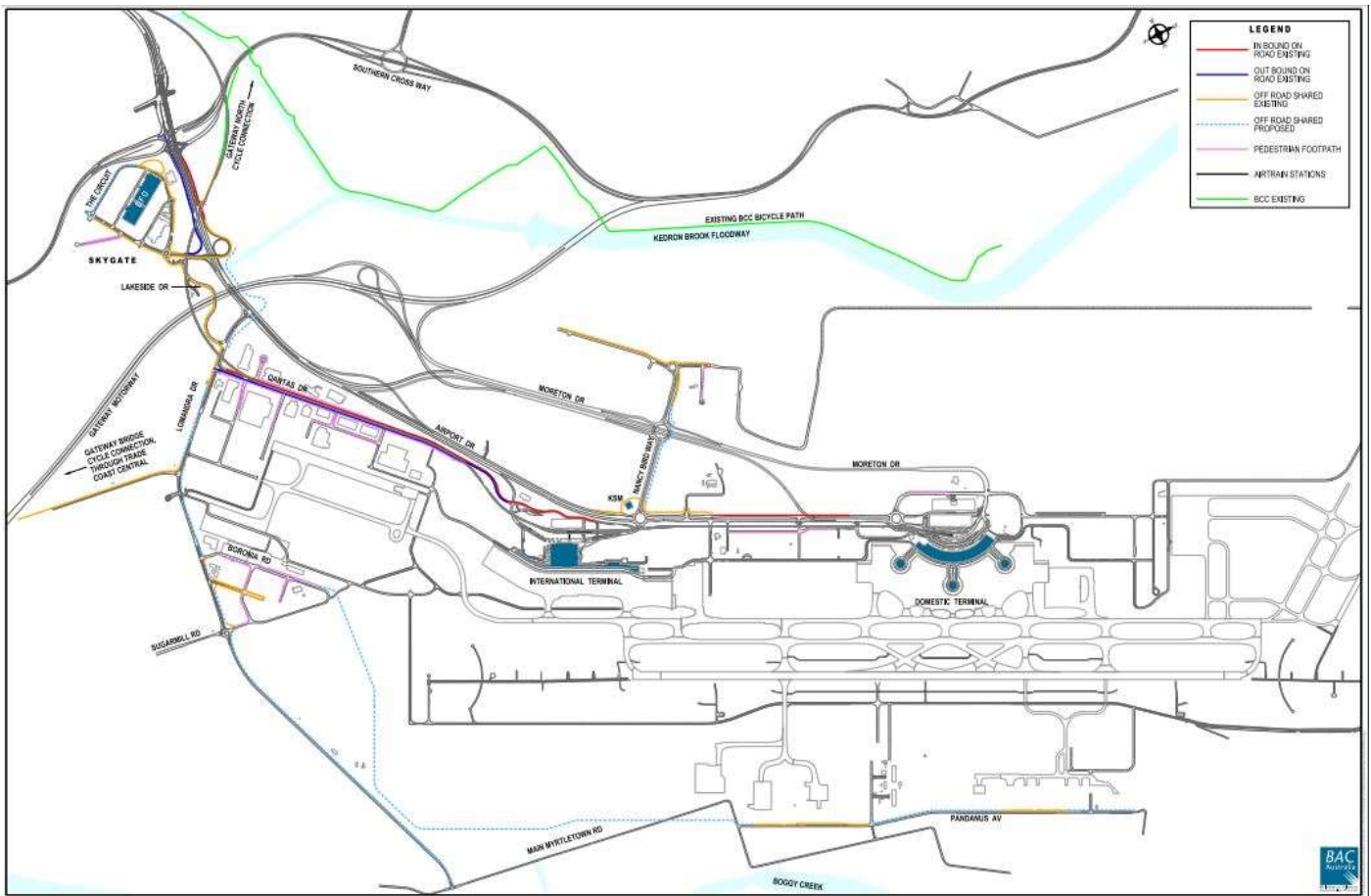
Although the footpath from the Domestic Terminal only goes as far as the BNE Service Centre, Brisbane Airport Corporation plans show a proposed shared pathway connecting to Banksia Place along Nancy Bird Way. Indeed a sign on the footpath near the taxi waiting area says: “Caution Footpath construction incomplete. No pedestrian access past this point”, which implies that one day the footpath will be completed. However after almost a decade the footpath remains incomplete and the BAC has not met the “interests of airport users and the general community”.



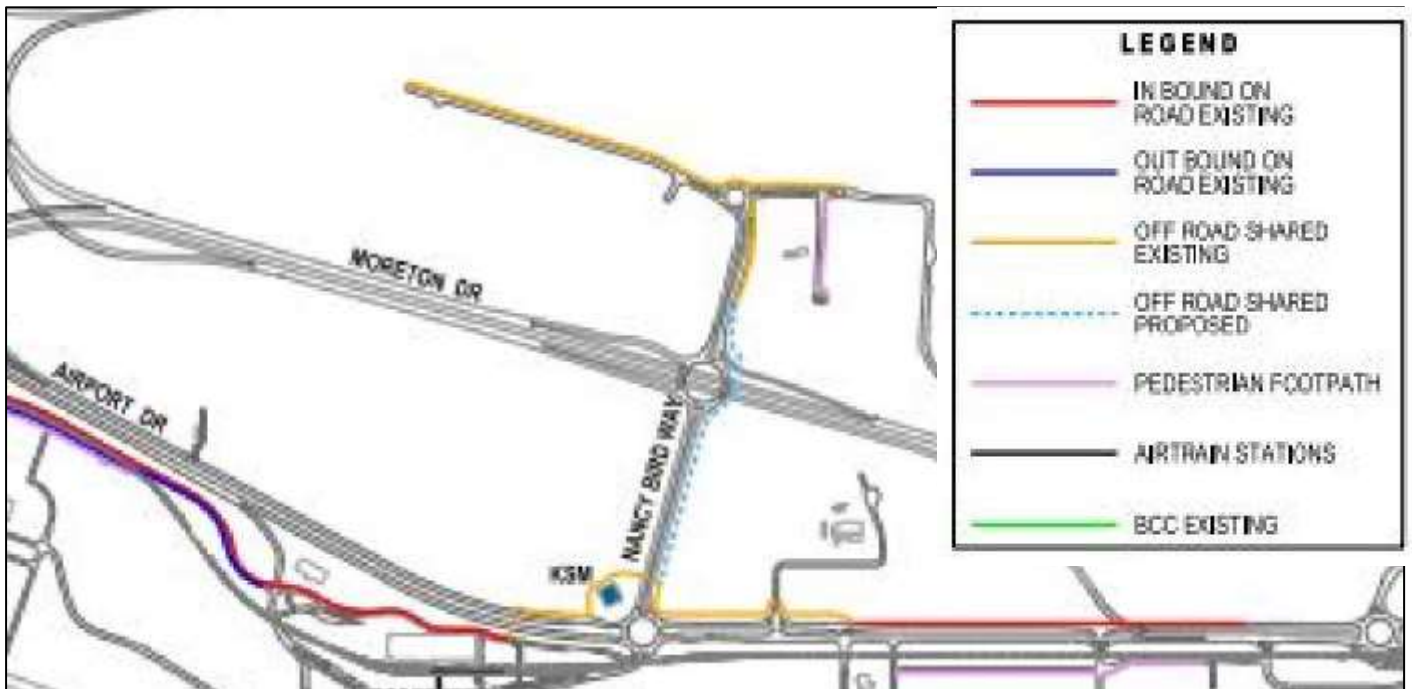
Above: A man stands on the incomplete footpath at Banksia place whilst another walks on the road shoulder towards the terminal.



Left: Close up of the footpath incomplete sign at Banksia Place. We believe this sign may have been erected in 2009 when Nancy Bird Way was constructed.



Above: Brisbane Airport Corporation plan of cycling connections – existing and proposed at Brisbane Airport.



Above: Close up of BAC cycling connections plan and legend showing proposed off road shared path under Moreton Drive to Banksia place (blue dashed line) which has never been completed.

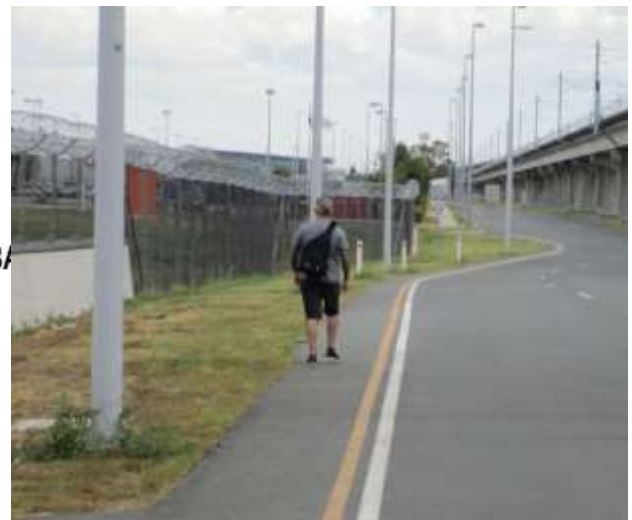
The Domestic Terminal

There is no pedestrian access to the Domestic Terminal other than from the car park. There are no footpaths on Airport Drive and pedestrians are prohibited from walking the short distance (450 m) to the Domestic Terminal on Hibiscus Street. The footpath on Hibiscus St terminates outside Qantas Freight and there is a sign prohibiting pedestrians. Hibiscus St is a quiet street parallel to the Airtrain line and is the access to Virgin Valet parking.

It would be easy to construct a footpath on the grass verge of Hibiscus St to the Domestic Terminal or to simply allow people to walk on the road as it has very little traffic. The Airport Corporation cite security concerns when asked why pedestrians cannot walk the short distance along Hibiscus St to the terminal building. The airport corporation will not explain what these security concerns are and how Virgin valet parking customers who drive along this Hibiscus Drive are not a security concern. The airport corporation did not respond to queries asking if they had any plans to modify fencing or surveillance of this road to address security concerns and enable pedestrian access.



Above: The footpath on Hibiscus St ends about 450 m from the Domestic Terminal. A sign prohibits pedestrians.



Above: Pedestrians walk along Hibiscus St despite signs prohibiting pedestrians. BAC do not seem to enforce the pedestrian prohibition.

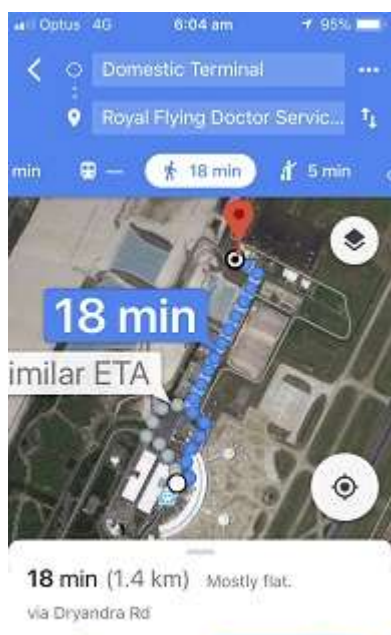
Hibiscus Street would also be a good street for cycle access to the Domestic Terminal as it is quiet and safe and joins to the bike lane on Gahnia St, however the Brisbane Airport Corporation again cites security concerns for not allowing cyclists to use Hibiscus Street. Instead the Brisbane Airport Corporation prescribes a bicycle route up Airport Drive and through the busy two lane roundabout. This roundabout is neither safe nor comfortable and only a fast and fearless cyclists would ride there. In addition the BAC prescribed bicycle route does not lead to the Domestic Terminal

building. It leads instead to a far carpark necessitating two elevator trips and a fair walk across the car park to get to the bicycle racks. Airport BUG do not support the BAC bicycle route. Airport BUG insists bicycle racks should be able to be accessed by riding a bicycle to them and bicycle routes should be suitable for all ages and abilities not just the fast and fearless.

The Domestic Terminal is arguably the most important precinct at the airport for both workers and travellers. Despite Airport Masterplans espousing support for active transport, access to the Domestic Terminal is prohibited for pedestrians and unsafe for cyclists. The easiest win for active transport at Brisbane Airport would be to allow people to walk and cycle along Hibiscus Street to access the Domestic Terminal. That the Airport Corporation refuse to do this shows that they have no intention in following the initiatives in the Airport Masterplan and indeed suggest a hostility by the Brisbane Airport Corporation to active transport modes. This is yet another example of why more regulation and oversight of airports is required, to ensure initiatives in Airport Masterplans are followed up with actions on the ground in a timely manner.

The General Aviation Precinct

Until October 2018 the General Aviation Precinct (GAP) was accessible by walking and cycling along Dryandra Rd, a lightly trafficked wide road with street lighting and curbing. People employed at the GAP walked the short distance to the Domestic Terminal to public transport stops there. FIFO workers and pilots also walked to the Domestic Terminal to catch flights. The walking route between the Domestic Terminal and the General Aviation Precinct was available from the Translink Public Transport route planner and from Google Maps which advised the walk would take 18 minutes.



Above: Google maps walking route between the Domestic Terminal and General Aviation Precinct.



Above: Translink prescribed walking route to access public transport from the GAP.



Above: A person walks along the now closed Dryandra Rd from the General Aviation Precinct to the Domestic Terminal

In February 2017 Airport BUG asked Brisbane Airport Corporation if the new taxiway underpass planned for Dryandra Rd would have a footpath and bikelane? BAC replied that a new underpass would exclude pedestrians. Cyclists would be permitted but no bike lanes were planned.

Airport BUG was dismayed that existing pedestrian access would be removed and that cycling infrastructure was not being included in this project. Airport BUG immediately started campaigning for continued pedestrian access to the General Aviation Precinct and for bicycle infrastructure to be included in the road project.

Airport BUG met with The Brisbane Airport Community Aviation Consultation Group (BACACG) in March 2017 and together with representatives from the Australian Heart Foundation, presented the case for continued active transport access to workplaces at the General Aviation Precinct. The local newspaper was interested in the issue and produced an article outlining the concerns: <https://www.couriermail.com.au/questnews/runway-underpass-a-problem-for-active-travellers/news-story/3d1f8d4c4a4809fc499ca65900aadbfa>

Airport BUG wrote to the Federal Transport Minister, met with local MPs Trevor Evans MP and Wayne Swan MP, and ran a petition on Change.org and a petition to the Federal House of Representatives (Petition EN0163 which sadly was rejected).

In discussions with Airport BUG, BAC representatives admitted that the reason they did not design and build an underpass which catered for pedestrian and cyclists was because they believed there was low use of these transport modes. Airport BUG presented BAC with data from the Strava cycling ride sharing app which showed that many cyclists use this road. The Strava Cycling app records a total of 1269 bicycle rides on Dryandra Rd for the year in 2017, of these rides 437 were different individual cyclists and 273 of these rides were recorded as 'commutes'. We advised BAC that from our observations and from talking to people who work at the General Aviation Precinct that quite a number of pedestrians use Dryandra Rd that this route was designated as a walking route on the Translink Journey Planner and on Google maps.

The argument by BAC that a pedestrian facility would have little use is discredited by clear evidence that people were already walking the short distance from the Domestic Terminal. Moreover, the airport plans to expand the General Aviation Precinct which would attract more people who would walk.

Airport BUG argue that regardless of current use, providing pedestrian and cycle access to workplaces is part of Brisbane Airport Corporation's obligations in managing an airport. Brisbane airport has plans for expansion and predicts an increase in the workforce at the airport to fifty thousand people (the size of a regional town) by 2034, so infrastructure must be designed for future uses.

In about October 2018 pedestrian access to the General Aviation Precinct was cut off. Now people can no longer walk the short (18 minute) walk from the public transport stops at the domestic terminal to their workplaces at the General Aviation Precinct and the aircraft viewing area because walking through the new underpass on Dryandra Rd has been banned. There is no public transport to this precinct so it means people must use a car now. The workplaces affected include the Royal Flying Doctor Service, TOLL freight, GAM and several others.

Despite the ban on pedestrian access, it seems BAC are having some difficulty stopping pedestrians walking to and from the General Aviation Precinct judging by the many signs they have put up both at the domestic terminal and along Dryandra Road.



Sign on Dryandra Rd prohibiting pedestrian access



Sign at Domestic Terminal walkway advising closure of pedestrian access to GAP and Aircraft Viewing area.

The BAC are now claiming safety and security as the reasons for excluding pedestrians. This is likely because the now completed underpass does not include any provision for pedestrians. Brisbane Airport Corporation (BAC) have stated in a recent correspondence: "Pedestrians will not be permitted in the underpass due to the significant security and safety risks. Cyclists, though not encouraged, will be able to ride through the Underpass using the wide shoulders, but as you are aware there is no dedicated lane linking to or in the underpass".

We don't believe the safety and security risks for people walking are more difficult to design for than for people in motor vehicles. Many other airports around the world have managed to allow pedestrian (and bicycle) access through taxiway underpasses including, Frankfurt, Calgary, Manchester, Guangzhou and Schiphol Airport.



Underpass at Amsterdam Schiphol Airport with cycle and pedestrian facility.



Taxiway underpass at Manchester Airport with a pedestrian pathway.

The decision not to include pedestrian (or bicycle) facilities in the Dryandra Rd underpass is inconsistent with statements in the Brisbane Airport 2014 Masterplan which commit the Brisbane Airport Corporation to: “maximise connectivity and accessibility” (Ch 12 p.215). The decision is also contrary to initiatives in the Airport Masterplan to: “Expand the active transport network across the airport”. and “Improve footpaths, aiming to improve pedestrian connectivity between key precincts” (Ch 12. pages 262 and 269). The removal of pedestrian access and bicycle access is also inconsistent with the initiatives in the Brisbane Airport Ground Transport Plan 2012 to “encourage employees to use alternative modes” and “enable a mode shift to public transport, walking or cycling”.

Lack of compliance with the Brisbane Airport Development Control Document.

According to the BAC web site: “The Brisbane Airport Development Control Document is the primary reference for planning requirements that relate to the built environment. It has been developed to support and advance the development direction set by the Brisbane Airport Master Plan”. It is available is on the BAC web site at:

<https://bne.com.au/corporate/projects/development-documentation>

The Brisbane Airport Development Control Document prescribes developments over 2000m² must have end of trip facilities. (Page 25. Section 4.8 - Active and Public Transport.) Despite this mandate, there are no end of trip facilities in the new Pullman and Ibis Hotels at Brisbane Airport or at the new 9260m² Skygate Home and Life Centre. There is not even a bike rack for staff or customers in these new developments. It is clear that the BAC has not complied with the Brisbane Airport Development Control Document in these developments and possibly others. It remains to be seen if the Domestic Terminal redevelopment due to be completed in late 2020 which includes: “50 new tenancies including reconfigured and upgraded food halls, specialty retailers, premium bars and restaurants” will have any end of trip facilities for the many staff who work there.



Left: The recently completed Skygate Home and Life Centre.

Brisbane Airport argues for light handed regulation despite evidence of poor outcomes.

In their submission to the Economic Regulation of Airports, the Brisbane Airport Corporation asserts that the desire to protect their good reputation will keep them doing the right thing. They say: “BAC has a strong incentive to ‘do the right thing’ to maintain its reputation as a good corporate citizen” (p.7). This assertion is not supported in our experience and even if it were true, it is an inefficient, ineffective and unreliable way to gain good outcomes for airport developments.

The removal of pedestrian access to the GAP has been widely condemned amongst the airport community as evidenced by the signatures on two petitions and numerous written complaints sent to the Brisbane Airport Corporation. Combined with comments on social media, an article in the local newspaper, representations from the Australian Heart Foundation and from two Federal MPs, if public opinion was to influence the Brisbane Airport Corporation to do the right thing, this should have been sufficient. Changes to the design could have been made at his time (March 2017) as excavation was only commencing. However the Brisbane Airport Corporation was unmoved by public option and continued to press ahead with plans to construct transport infrastructure with excluded active transport users. Now the Dryandra Rd taxiway underpass has been built and the people who used to walk to work can no longer do so as this road is the only connection. Another wave of community dissent has arisen, including a formal complaint to the ACCC of anti-competitive behaviour and abuse of market power by the Brisbane Airport Corporation in excluding pedestrian access in order to induce more airport users to use on-airport car parking and increase airports’ profits from these services.

The Airport Corporation cannot easily modify the underpass now even if they wanted to because construction has been completed. This example illustrates why statements by the Airport Corporation in their submission regarding regulation not being required because they will do the right thing to protect their reputation are incorrect. It is better to regulate for good outcomes from the start rather than try to retrofit after people complain.

It is for this reason that the regulatory regime for airports must be overhauled to include regular monitoring and enforcement of Airport Masterplans and to include penalties for non – compliance with Airport Masterplans.

What is good for the Airport Corporation is not necessarily good for the community.

Airport corporations are private companies and obliged to maximise profits for shareholders. It is naive to expect Airport Corporations to abide by the initiatives in the transport plan if it will not increase profits or if there is no enforcement or penalties for non-compliance. The preparation of an Airport Masterplan and a Ground Transport plan is of no use if it is not acted upon and implemented. In the absence of an effective regulatory framework Airports will continue to produce Masterplans which espouse support for active transport and list impressive active transport initiatives, whilst in practice taking no action or taking years to implement any plans.

Urban designers and health advocates acknowledge built environments are important contributors to our health and wealth and that poor urban planning is a major culprit in worsening obesity rates and associated lifestyle diseases such as diabetes. Health advocates describe urban environments which are unfriendly to walking and cycling as “obesogenic”. Queenslanders who work at Brisbane Airport and want to use public and active transport are being disadvantaged compared to their peers outside the airport. Without safe active transport options many workers at Brisbane Airport do not have the option to do the right thing by themselves and invest in their health, save on transport costs and live sustainably because their workplaces are not able to be reached safely by walking and cycling.

People who work outside the airport are protected by state and local planning instruments which ensure facilities for active transport are included in developments. Brisbane Airport is on Federal Government owned land and is exempt from these local and state planning regulations but supposedly protected by the *Airports Act 2006*. In the cases cited and many others this regulatory regime has failed and Brisbane Airport has been allowed to become an obesogenic black spot in Brisbane’s healthy and active transport landscape.

Conclusion:

Airport Masterplans and Ground Transport plans are mandatory requirements under the Airports Act 1996. They are part of a system for the regulation of airports designed to look after the interests of airport users and the general community. The evidence presented in this submission shows the interests of airport users and the general community in regard to active transport are not being met. Evidence presented included the following examples:

- Inaction by airport managers to implement airport masterplan initiatives on active transport connections to the Da Vinci Precinct. This connection has taken over a decade and is still not implemented.

- Airport managers refusing to implement simple improvements such as allowing pedestrian and cyclist access on Hibiscus St to facilitate active transport access to the Domestic Terminal.
- Airport managers refusing to include provision for active transport in road projects causing existing active transport access to be lost, such as occurred with the Dryandra Rd underpass project.
- Airport managers not applying standards prescribed in the Brisbane Airport Development Control Document resulting in no provision for active transport users in new developments including the Skygate Home and Life development and the Ibis and Pullman Hotel developments.

Without regulatory intervention Brisbane Airport will only get worse for active transport access to the detriment of the health, wealth and equity of Queenslanders who work there. Better and more effective regulatory oversight and enforcement is needed at Brisbane Airport to ensure Queenslanders who work at there are not disadvantaged compared to their peers who work outside the airport regarding provision for active transport.

We maintain the regulatory oversight process at Brisbane Airport has not been effective. From examples cited in this submission it is evident that the Brisbane Airport Corporation does not comply with their Masterplan and Ground Transport plan in many areas relating to active transport. The examples presented in this submission illustrate that regulatory oversight of has not been effective and support our case for the need for increased regulation of airports. Despite clear statements in the Brisbane Airport Masterplan directing provision for active transport and mandates in Brisbane Airport Development Control Document to provide for active transport in developments, the Brisbane Airport Corporation have not complied with these requirements. The current regulatory environment has not resulted in meeting objects of the Airports Act to “establish a system for the regulation of airports that has due regard to the interests of airport users and the general community”. We call for changes to airport regulation to ensure compliance with the legislative requirements including meeting the objects of the *Airports Act 1996*.

Yours sincerely

Mitchell Bright
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Airport BUG Inc