

# POST IMPLEMENTATION REVIEW OF THE HOBART AIRSPACE DESIGN REVIEW

**Consideration of Feedback on the Draft PIR Report** 

Version 1.0

**Effective Date: 04 April 2022** 



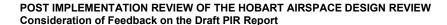


# **CHANGE SUMMARY**

Version	Date	Change Description
1.0	04 April 2022	Report for publication

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#### 1. BACKGROUND

In September 2017, Airservices Australia (Airservices) introduced changes to arrival and departure flight paths at Hobart Airport that were designed to organise aircraft onto standard routes. The implementation of the new flight paths was associated with satellite-based navigation systems aimed at improving the safety of aircraft landing and departing at Hobart Airport.

In response to community concern about these flight paths and the associated environmental assessment and community engagement process, Airservices committed to a comprehensive review of the Hobart flight path changes. This was known as the Hobart Airspace Design Review and was undertaken by Airservices between January 2018 and March 2019. The flight path changes determined through the Design Review, as well as changes to the Tasmanian high-level routes, new procedures associated with the relocation of the very high frequency omni-directional range navigation aid, and changes to Noise Abatement Procedures (NAPs), were all implemented on 7 November 2019.

In accordance with Airservices' internal National Operating Standard, Post Implementation Reviews (PIRs) are conducted for airspace and flight path changes to review actual operations against predictive modelling of potential environmental and community impacts, and to determine the effectiveness of the environmental impact assessment and community engagement processes. The outcomes of PIRs inform future changes and improve the overall change management process.

The scope of the Hobart PIR was developed in consultation with the community and considers all of the flight path changes implemented by Airservices on 7 November 2019, the supporting environmental assessments, and community information regarding aircraft operations and forecast noise. To support the PIR, three short-term noise monitors were installed for a period of six months. As part of the PIR, Airservices also sought suggested flight path alternatives from the community and aviation industry.

#### Public comment on the draft PIR report

The draft PIR report was released for public comment for a six-week period that commenced on 5 November 2021 and concluded on 17 December 2021. A community information session was held in Hobart on 13 November 2021 to present the findings of the PIR.

There were 50 submissions, including one submission from a community group representing over 100 members, received during the public comment period on the draft PIR report.

This document presents the public comment submissions and Airservices' response to the comments received, including details of any changes made to the PIR report as a result of the feedback.

Submissions have been split into separate comments and grouped into themes to reduce repetition of responses. All comments remain in verbatim form, with the exception of removing personal identifying text (to satisfy privacy requirements) and line breaks (to condense this report). The numbering of submissions is based on the date order in which the submissions were received.



## 2. SUBMISSIONS AND RESPONSES

#### 2.1. Community engagement

#	Comment	Airservices Response	PIR Report Changes
10	Tokenistic engagement isn't idea to true engagement and consumers should be able to provided feedback anonymously	In order to follow up or seek clarifications related to feedback provided we need to know who has provided comment and are therefore unable to accept anonymous feedback. We are committed to the Australian Privacy Principles <sup>1</sup> in relation to personal identifiers and do not publicly reveal details of any person who has made a submission.	
27	I could not enter [identifier removed] as my location in this survey	We will provide this feedback to the software provider. The software platform for <u>Engage Airservices</u> is used worldwide, and the 'suburb' field used in the survey form is based on an established list of registered suburb/locality names for each state and territory. The location referenced is unfortunately not a registered suburb/locality.	
41	Form is inadequate - why don't you have the recommendations listed out so people could easily respond?	Thank you for your suggestion to improve the <i>Engage Airservices</i> online survey form to list out recommendations for public comment responses. This has been noted and will be considered for future engagement activities. Public feedback was invited on the full draft PIR report, including the findings and recommended actions arising from the review.	
46	Prior to the implementation of the November 2019 airspace and flight paths, we engaged with air services Australia to discuss our serious concerns about flight path changes that had occurred in 2017 due to the adoption of Standard Terminal Arrival Routes and	We acknowledge and appreciate your participation and feedback provided on the Hobart Airspace Design Review in 2018.	

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<sup>&</sup>lt;sup>1</sup> https://www.oaic.gov.au/privacy/australian-privacy-principles



#	Comment	Airservices Response	PIR Report Changes
	Standard Instrument Departure routes. The flight path changes resulted in departing jet aircraft flying directly over our home while departing at high thrust on the RW 12 jet SID, introducing extremely high noise levels in this once quiet area of Primrose Sands. The noise levels were at a level that could be easily heard underwater when diving or snorkelling in the vicinity of the flight path, but could not be quantified as noise monitoring was not undertaken. Air Services Australia subsequently moved the RW12 jet SID several kilometres southwards in response to community representations, and now the noise from aircraft departing via the RW12 jet SID is tolerable. This action was appreciated.  Given our involvement in the previous consultation round, we were concerned when we discovered in November 2021 that Air Services Australia had recommenced consultation via the post implementation review, and had not contacted us to participate. This lack of notification was surprising given our previous representations. As a result, we could not participate in any of the Post Implementation Review process steps, particularly the community suggested alternatives process. Some of the proposed community suggested alternatives, if implemented, would directly impact upon us, and so we have a keen interest in highlighting the potential impact on residents in the Primrose Sands area.	apologise for this and can confirm that your details are now registered on <i>Engage Airservices</i> , ensuring you will receive direct notification of any activities associated with the PIR.  In addition to notifying those registered on <i>Engage Airservices</i> , we also sought to maximise awareness of the PIR through a range of channels including local media, the Hobart Airport Community Aviation Consultation Group (CACG), elected representatives including local Council, State and Federal members previously involved in the Hobart Airspace Design Review, Hobart Airport, the Department of State Growth, education facilities, and the Aircraft Noise Ombudsman. Hobart Airport, Councils and elected representatives were asked to share the information on the PIR with their networks.  The PIR aims to identify any safe and feasible flight path alternatives that may improve operations and/or noise outcomes for the community. There are seven community and industry suggested flight path alternatives that will now be subject to further design, safety and environmental assessments, and community and industry engagement prior to a decision on implementation being made. You will have the opportunity to comment on all proposed alternatives during this consultation.	
46	We look forward to receiving your response to our comments and ask that you note our desire to be actively involved in further consultation in relation to the review.	Thank you for continuing to engage with Airservices. Your request to be actively involved in further consultation has been recorded. All consultation activities will be communicated widely, including direct notification to everyone registered for Hobart updates on <a href="Engage Airservices">Engage Airservices</a> .	



#	Comment	Airservices Response	PIR Report Changes
47	SECLA submission was only counted as one submission, although over 100 people signed the document; this needs to be stated clearly and included in the statistics.	community members, and this has been considered as part of the PIR. The reporting of submissions notes the number of unique submissions received, and we will update the PIR	Appendix G (Community Suggested Alternatives) has been updated to acknowledge the submission signed by over 100 community members.

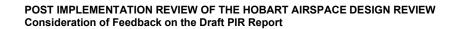
#### 2.2. Community information session

#	Comment	Airservices Response	PIR Report Changes
10	That those most impacted by flight path aren't living in hobart, the feedback session as West Point is no where near those impacted. Short notice of event and distance to travel to provide feedback isn't ideal to true community engagement.	Due to the COVID-19 travel restrictions, our noise and technical experts were unfortunately not able to travel to Hobart and meet with the community face-to-face. As a result, the venue selected for the community information session needed to have suitable video conferencing, recording and live streaming services. The Wrest Point Hotel was selected as it provided the necessary equipment and services, as well as being accessible for communities to both the west and east of Hobart Airport which experience flight paths overhead.	
		To address potential challenges with travel, we also provided a live stream of the community information session to enable people to watch and ask questions online. A copy of the full recording was made available on <a href="Engage Airservices">Engage Airservices</a> following the session.	
		We provided 14 days' notice of the community information session. This is consistent with current planning for community events due to the ongoing uncertainties with changing COVID-19 travel and event restrictions.	

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#	Comment	Airservices Response	PIR Report Changes
		The community information session was conducted at the commencement of the six-week public comment period. Formal feedback on the draft PIR report from community members and stakeholders was sought during the six-week public comment period that concluded 17 December 2021.	
47	Feedback on the draft Hobart PIR Report I attended the presentation at the Wrest Point Hotel in Hobart on 13th November 2021; I am extremely concerned and worried about the review. The venue was not clearly advertised and the room not easily found within the building complex.	Thank you for your feedback regarding wayfinding, which is a key consideration for Airservices community events.  Please note the venue for the community information session was provided in all notifications sent regarding the event.  Arrangements were made with the Wrest Point Hotel to have signs at both entries to the hotel and on the meeting room door, with hotel staff also directing people from both entries.	
27	I am concerned at the stealth that the ANZ paths were glossed over during consultationit was deceptive and trivializedyet it affects a much greater number of people than the ONE person in the modelling.	Our commitment is to ensure our engagement with communities that may be affected by proposed changes to flight paths and airspace is proactive, open, and transparent.  The community information session for the draft PIR report	
45	The Hobart consultation was rushed at the end and the time allotted to discuss this was non existent.  I feel that this was a part of the deception, effectively shutting down any opposition to it.	was conducted at the commencement of the six-week public comment period. The purpose of the session was to provide an opportunity for us to present the PIR findings, including the community and industry suggested alternative assessment outcomes. The PIR report details the assessments of the community suggested alternatives in Appendix G and the requested flight paths for Air New Zealand in Appendix H.	
		A period of three hours was planned for the presentation of the PIR findings, and we acknowledge that the community session ran over time. A copy of the Airservices presentation, video recording of the session, and Questions	





#	Comment	Airservices Response	PIR Report Changes
		and Answers summary was made available on <u>Engage</u> <u>Airservices</u> following the session.	
		Formal feedback on the draft PIR report from community members and stakeholders was sought during the six-week public comment period that concluded 17 December 2021.	
		The PIR identified seven community and industry suggested flight path alternatives that will now be subject to further design, safety and environmental assessments, and community and industry engagement prior to a decision on implementation being made. You will have the opportunity to comment on all proposed alternatives during this consultation.	

2.3. Noise modelling and monitoring

#	Comment	Airservices Response	PIR Report Changes
27	I am concerned that realignment is focused over water when Air Services, by admission at consultation, has no idea on the impact of noise over water. This is a serious blunder, completely un professional and devastating impact.	Thank you for this feedback. We have provided additional information to clarify how the noise modelling considers the reflection of noise from water bodies.  Sections A.1.2 and A.8.1 of the PIR report outline the use of the US Federal Aviation Administration's (FAA) Aviation Environmental Design Tool (AEDT) software to undertake aircraft noise modelling. The AEDT modelling is based on the noise certification testing undertaken by the aircraft manufacturer and performed in accordance with the relevant chapters of the International Civil Aviation Organization (ICAO) Annex 16 Volume 1 Environmental Protection – Aircraft Noise.  The AEDT estimates aircraft noise levels by using the aircraft manufacturer noise data and then applying adjustments to account for distance and the principles of atmospheric	New section A.9.6 added to provide clarification on how the noise modelling considers the reflection of noise from water bodies  New Recommended Action 11 has been added for Airservices to review available noise modelling software tools to improve the consideration of water bodies in the terrain model (per actions

#### OFFICIAL



#	Comment	Airservices Response	PIR Report Changes
		absorption. These adjustments are referred to as lateral attenuation, and take into account ground reflection, refraction, and aircraft shielding and engine installation effects.	arising from the community information session)
		The standard lateral attenuation adjustment in AEDT has been derived from field measurements made over grass-covered, acoustically soft terrain. The software currently makes some corrections for noise levels over hard surfaces (e.g. water) for propeller aircraft, so it is possible that the modelling can under predict noise for jet aircraft in areas that are predominantly hard surfaces. This limitation is addressed through calibrating AEDT noise models with actual noise monitoring data whenever monitoring data is available.	
		The short-term noise monitor at Connellys Marsh was located at a property on the coastline (see section A.8.3 of the PIR report), and the noise levels recorded by this monitor captured the reflection of aircraft noise over water. The AEDT modelling completed for the PIR has therefore accounted for the reflective impacts of the surrounding water bodies through the calibration of the AEDT model with the actual noise monitoring data.	
		The calibrated noise model for Hobart will be used for the assessment of the community and industry suggested alternatives that will now be subject to further design, safety and environmental assessments, and community and industry engagement prior to a decision on implementation being made.	
		The FAA has indicated that one of the AEDT's future development goals is to enhance noise modelling for airports near water, based on the FAA supported research for 'Improving AEDT Noise Modelling of Mixed Ground Surfaces'	



#	Comment	Airservices Response	PIR Report Changes
		that was conducted in 2017 through the Airport Cooperative Research Program <sup>2</sup> .	
18	I also wish to stress the point here that THE LAST 12 MONTHS CANNOT BE TAKEN AS INDICATIVE OF AVERAGE DAILY USAGE. At the CAGS meeting on Tuesday 9th November 2021 [name removed] informed members that in December and January there will be an increase of flights by 105% and 125% respectively and these are HIGHER THAN PRE-COVID FIGURES. These are drastic negative figures for the community who are suffering 17 - 18 hours a day WITHOUT ANY RESPITE and with NO CURFEW RULE in place to ensure we have a respite period.	We commence PIRs approximately 12 months after implementation of airspace and flight path changes to review actual operations against predictive modelling of potential environmental and community impacts, and to determine the effectiveness of the environmental impact assessment and community engagement processes. The outcomes of PIRs inform future changes and improve the overall change management process.  The PIR report acknowledges that aircraft operations at Hobart Airport have varied since March 2020 as a result of the ongoing impacts of COVID-19 on air travel, including changes to the types of aircraft and flight paths being used.	
		To ensure accurate assessment, our PIR process requires access to sufficient and representative aircraft movement and noise data to ensure accurate and valid analysis. The Hobart PIR considers actual aircraft traffic data for two periods: an interim summer period from 1 December 2019 to 1 March 2020 (prior to COVID-19 travel impacts), and a sixmonth period from 1 January to 30 June 2021 (during COVID-19 travel impacts). To take account of the variability in daily aircraft traffic levels, the PIR analysis also considers 'busy day' (90th percentile) movements to represent a typical airport busy day. The six-month analysis period had a busy day average of 66 operations in comparison to 75 busy day movements modelled in the original Environment Assessment, and this is considered to be suitably representative to meet the objectives of the PIR.	

 $<sup>^2\</sup> https://www.nap.edu/catalog/24822/improving-aedt-noise-modeling-of-mixed-ground-surfaces$ 



#### 2.4. Aircraft noise impacts

#	Comment	Airservices Response	PIR Report Changes
18	Communities currently overflown by flight paths were NOT GIVEN ANY CONSIDERATION BY AS and I can personally state and prove that I was continually lied to, received inaccurate documents and flight path diagrams from AS, was lied to at the last meeting with [personal information removed] who informed me no community member would be impacted or adversely affected by more than one flight path.  Planes start overflying my home at 6am in the morning and continue as late as 10.20pm and far later if delayed. THAT IS BETWEEN 17 - 18 HOURS A DAY WITH NO RESPITE.  If planes aren't arriving on the smart track they are departing on the departure track. On many occasions the planes that have flown in over my home on the smart track then depart on the departure track very near to my home due to continual wind changes. This departure track also appears to track to waypoint BAVUW.	the implementation of the Standard Instrument Departure (SID) and Standard Instrument Arrival (STAR) flight paths in 2017 and the changes implemented in 2019 through the Hobart Airspace Design Review.  We conduct PIRs into airspace and flight path changes to review actual operations against predictive modelling of potential environmental and community impacts, and to determine the effectiveness of the environmental impact assessment and community engagement processes. The outcomes of PIRs inform future changes and improve the overall change management process.  The scope of the Hobart PIR was developed in consultation with the community and considers all of the flight path changes implemented by Airservices in 2019, the supporting environmental assessments, and community information regarding aircraft operations and forecast noise. As part of the PIR, Airservices also sought suggested flight path alternatives from the community and aviation industry to ensure balanced outcomes.  There are seven community and industry suggested flight path alternatives that will now be subject to further design, safety and environmental assessments, and community and industry engagement prior to a decision on implementation being made. Two of these suggestions could provide potential noise improvement outcomes for your area. You will have the opportunity to comment on all proposed alternatives during this consultation.	
32	The new flight path over our previously peaceful valley has been a most unwelcome intrusion in our life. The flight path comes over forcett Tasmania, makes a hard right turn and comes in low	All civil aircraft operating in Australia are required to comply with the <i>Air Navigation (Aircraft Noise) Regulations 2018</i> regardless of size, purpose or ownership. Before an aircraft	



#	Comment	Airservices Response	PIR Report Changes
	over our rural homes. It is very disturbing to be woken by noisy air bus wining engines sometimes from 700am until 1030 at night. Because they are losing altitude and directly approaching the airport they surely are breaking noise regulations.?	begins operating in Australia it is required to meet international noise standards that specify the amount of noise that may be emitted by that type or model of aircraft. If an aircraft does not pass the certification process, it may not fly in Australia.	
34	6. The noise level is totally unacceptable for human habitation. For your consideration.	We explore all opportunities, where safe and feasible, to improve noise outcomes for the community.	
		In Australia, there is no regulated maximum noise level for aircraft operations. Without any maximum level set out in legislation or regulation, there is no objective measure to determine an acceptable level of aircraft noise.	
		We seek to minimise the impact of aircraft operations on communities through a range of measures that include our flight path change process, noise abatement procedures, application of our <i>Flight Path Design Principles</i> , reviewing community and industry suggested noise improvements, and through our formal PIR process.	
18	AS HAS ADMITTED THAT dBA READINGS ARE HIGHER THAN WE WERE INFORMED originally in this area and therefore must be detrimental to my health and everyone's health and AS has also ADMITTED THAT USAGE OF THIS FLIGHT PATH HAS INCREASED DRAMATICALLY AND WILL CONTINUE TO DO SO which means this current situation will continue to IMPACT NEGATIVELY ON PEOPLE'S HEALTH AND ON MINE.	Section A.9 of the PIR report presents the findings of the short-term noise monitoring and identifies a range of factors that influenced the differences between the noise modelling forecasts in the original Environment Assessment and the actual results for the PIR analysis period.  Noise modelling is an assessment of possible noise outcomes based on the best available information at the time. Australia has no legislated maximum allowable aircraft noise level, however aircraft must comply with the <i>Air Navigation (Aircraft Noise) Regulations 2018</i> and meet international noise standards that specify the amount of noise that may be emitted by that type or model of aircraft.	
		With regards to concerns about health, Australia is a member State of the International Civil Aviation Organization	





#	Comment	Airservices Response	PIR Report Changes
		(ICAO) and will consider any ICAO recommendation for further mitigation of human health impacts. ICAO has a Committee on Aviation Environmental Protection (CAEP) which monitors emerging scientific studies in relation to the health impacts of aircraft noise. The CAEP currently has no defined position on the health impacts of aircraft noise.	

#### 2.5. Other environmental impacts

#	Comment	Airservices Response	PIR Report Changes
33	I relocated to Carlton river for sanctuary & peace. The Tasmanian wildlife is amazing. Birds, swans on the river, wild ducks. It is a peaceful space in the world to be. Airplanes flying overhead constantly is disturbing not just for me but for the natural environment, It is concerning that the loud & intrusive aeroplanes flying over head is not just impacting on residents but also on Tasmanian wildlife.	Under the <i>Air Services Act 1995</i> (Cth), Airservices has an obligation to provide environmentally responsible services by minimising the environmental impact of aircraft operations. Airservices must comply with the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act) (Cth).  Our <i>Flight Paths Design Principles</i> include an environmental principle to consider matters of national environmental	
34	This submission is in regard to the "Smart Tracking" Flight Path over Primrose Sands. I have only until the 17th December to lodge this Submission.  Community consultation activities and flight path designs have previously been explained (see [NCIS reference removed]). The wife and I believe that there are still a few points that need to be taken into consideration.  Our sea eagles frequent the Carlton Bluff area of the flight path every day. They do not recognize that their nests may not be on land reserved under the Nature Conservation Act (NCA). We have a photo taken recently on an easily recognized tree on the Bluff Point of 3 sea eagles on that tree. It seems ironic that the flight path traverses Sea Eagle Road and Wedge Tail Street on the Bluff.  The Flight Path over the Dunalley area was a much fairer path for	significance, other sensitive habitats, and registered heritage sites.  We undertake an environmental assessment screening process for all changes to aircraft operations to identify changes that require a more comprehensive environmental assessment. The environmental assessment considers the potential impact of the proposed change on matters of national environmental significance (MNES) as required under the EPBC Act. This includes nationally and internationally important flora, fauna, ecological communities, and heritage places.	



#	Comment	Airservices Response	PIR Report Changes
	the following reasons:- 4. As air traffic increases it will be "death by a thousand strokes" for both sea eagles and wedge tail eagles 5. Despite all the rhetoric regarding the minimal chances of collisions with these large birds the chance of a collision will always be there.	Under Section 28 of the EPBC Act, approval is required for an action taken by Airservices that is assessed as likely to have a significant impact on the environment.  The environmental assessment for the Hobart flight path changes implemented in November 2019 included an assessment of the potential impacts of aircraft noise on birds and other wildlife.  The MNES <sup>3</sup> search considered areas subject to the proposed changes within a 25km radius of Hobart Airport that were not previously overflown by arriving and departing passenger aircraft but that may have been overflown by general aviation traffic. The Species Profile and Threats Database <sup>4</sup> was then used to consider any potential impacts	
37	The planes flying over Carlton River, they are noisy and disturb the bird wildlife that.  I would like the planes diverted to a different flight path away from the Carlton River area as the noise and frequency of planes has had a negative impact on the area, reducing the livability of the area. Also the bird wildlife numbers on Carlton River have noticeably reduced.		
41.0	The planes are flying directly overhead very often. Noise is disruptive to me and no doubt to the birdlife on the Carton River. I support moving the Flight path to an area to somewhere where there will be less impact, preferably the options out to the east. These appear to have been ruled out due to cost, but I would request they be considered to avoid costs to others. No matter where it goes, please limit flight times to 7 am to 9 pm. At the least, I support the changes to monitoring times to be more representative. Some times it is quiet, but when it is not, the noise is frequent and disturbing. Please listen to the residents of Carlton, we moved here for the peace and quiet, not to be directly under a flight path.  I support recommendation for further assessment, but also request that the flight path over Carlton River be moved ASAP.	upon these species. No critical habitats were identified within the areas of the MNES search. Of the critically endangered species, none were identified in the relevant Recovery Plans <sup>5</sup> as being particularly sensitive to noise disturbance, including aircraft noise. The Recovery Plans did not determine noise levels which may induce stress (or include any associated actions).  The assessment also considered Australian and United Kingdom studies on the effects of noise on wildlife.  The assessment determined that there were no likely impacts to the natural environment as a direct result of implementing the flight path changes due to areas being already overflown by aircraft and, for areas that would be	

<sup>&</sup>lt;sup>3</sup> https://www.awe.gov.au/environment/epbc/protected-matters-search-tool

<sup>&</sup>lt;sup>4</sup> http://www.environment.gov.au/cgi-bin/sprat/public/sprat.pl

<sup>&</sup>lt;sup>5</sup> https://www.awe.gov.au/environment/biodiversity/threatened/recovery-plans



#	Comment	Airservices Response	PIR Report Changes
		newly overflown, the altitude of aircraft being such that the impacts on wildlife would be highly unlikely.	
6	I'm concerned about flight paths and people on tank water, and the water quality due to emissions of airplanes	All civil aircraft operating in Australia are required to comply with the <i>Air Navigation (Aircraft Engine Emissions)</i> Regulations 1995 (Cth) regardless of size, purpose or ownership. Aircraft must satisfy the aircraft emissions requirements of the International Civil Aviation Organization (ICAO) Annex 16.	
		The ICAO Environmental Report 2016 <sup>6</sup> examined aviation emissions environmental impacts and noted that while aircraft may contribute to a very small proportion of residues because they produce emissions at lower height levels during approach, take-off and landings (which can combine with dust and other particles in the atmosphere), the levels being emitted are so low in comparison with emissions from cars and other industry that the contribution, even in the vicinity of the airport, is negligible. The report therefore considered that aircraft emissions do not have an effect on water quality due to dispersion into the higher level atmosphere and the bulk of residues that occur due to other sources.	
		Dark residues on houses, cars and other outdoor objects are quite often attributed by the public to aircraft emissions, particularly in areas which are in the vicinity of an airport. Residues of this nature can be caused from a number of sources including:	
		<ul> <li>pollutants combining with dust and other particulate matter</li> </ul>	

<sup>&</sup>lt;sup>6</sup> https://www.icao.int/environmental-protection/pages/env2016.aspx





#	Comment	Airservices Response	PIR Report Changes
		<ul> <li>incomplete combustion of fuels which can relate to bushfires and burn offs as well as incomplete combustion from vehicle and other engines</li> </ul>	
		<ul> <li>biological residues as a result of release by some plants or fungi.</li> </ul>	

2.6. Community and industry suggested flight path alternatives

#	Comment	Airservices Response	PIR Report Changes
7	Where are the new flight plans? You want feed back but no information given are they stating the same???	review actual operations against predictive modelling of potential environmental and community impacts, and to determine the effectiveness of the environmental impact assessment and community engagement processes. We also seek to identify opportunities through the PIR to improve operations and/or noise outcomes for communities. The outcomes of PIRs inform future changes and improve the overall change management process.  The scope of the Hobert PIR was developed in consultation	New section – Appendix K: Flight Path Change Process – added to provide information on the next steps for the community and industry suggested flight path alternatives that have been recommended to progress for further assessment.
28	This was supposed to be a 'performance' review, not a full airspace re-design, which is what the final report looks like.		
		Consistent with our <u>Community Engagement Framework</u> , we seek to be transparent in considering all feedback and sharing information on our decision-making process. The PIR has therefore assessed every flight path change suggestion that was submitted during the public comment	



#	Comment	Airservices Response	PIR Report Changes
		period, including suggestions for flight path changes that have been considered and disregarded previously.	
		The preliminary assessments of the suggestions are included in Appendix G and Appendix H of the PIR report. There are seven community and industry suggested flight path alternatives that have been recommended to progress for further assessment. It is important to note that further design, safety and environmental assessments (including noise modelling), and community and industry engagement will be undertaken prior to a decision on implementation being made.	
		The <u>Flight Paths Design Principles</u> , which guide our design, development and decision-making regarding flights paths and their implementation, will be considered through this process.	
		Community consultation activities will be communicated widely, including direct notification to everyone registered for Hobart updates through <i>Engage Airservices</i> , local government authorities, elected members, and the Hobart Airport Community Aviation Consultation Group. Community members that may be affected by any proposed change will also be targeted through this engagement.	
29	Sorry I don't understand which 3 flight paths you are considering. Would be happy to comment further if you explained exactly where abouts the planes would be flying.	The preliminary assessments of all community and industry suggested flight path alternatives are provided in Appendix G and Appendix H of the PIR report.	
		The PIR identified seven flight path alternatives that are recommended to progress for further assessment. These seven alternatives are described in sections G.2.3 (move the RWY30 RNP-AR STAR 2-3km to the east), G.2.5 (Noise Abatement Procedure to use the RWY30 RNAV STAR at night), G.2.6 (move RWY30 arrivals to the east coast), and H.2 (new flight paths for Air New Zealand). These	



#	Comment	Airservices Response	PIR Report Changes
		suggestions will now be subject to further design, safety and environmental assessments, and community and industry engagement prior to a decision on implementation being made. You will have the opportunity to comment on all proposed alternatives during this consultation.	
35 38	I am very concerned by the recommendations contained in Airservices's draft Hobart PIR report: • Recommended suggestions for further consideration are informed by the views of a very small number of community members. Suggestions made in a joint submission signed by over 100 households from the Dunalley area, plus 13 individual submissions, were disregarded. By contrast only 20 individual submissions were made by people from the Carlton River area, with 6 suggestions made by a single resident accepted.	The PIR has assessed every flight path change suggestion that was submitted during the public comment period, including suggestions for flight path changes that have been considered and disregarded previously.  Appendix G of the PIR report describes the process for determining the flight path change alternatives for assessment. Each submission was reviewed and grouped by which flight path(s) they related to, then the type of change (lateral, vertical etc), and lastly by the specific details of the suggestion. The PIR sought to identify any safe and feasible alternatives, and this is not altered by the number of submissions making the suggestion.  There are seven community and industry suggested flight path alternatives that will now be subject to further design, safety and environmental assessments, and community and industry engagement prior to a decision on implementation being made. You will have the opportunity to comment on all proposed alternatives during this consultation.  We have reviewed the joint submission on community suggested alternatives and acknowledge this was signed by over 100 households. All of the flight path alternatives suggested in the joint submission have been included in the assessment of suggested alternatives detailed in Appendix G of the PIR report.	
40	I attended the meetings with the community in the Dunalley Neighbourhood House and the Dunalley Community Hall and participated in the discussions that allegedly took notice of community feedback.  I agree with all the points raised by SECLA as follows:  Recommended suggestions for further consideration are informed by the views of a very small number of community members. Suggestions made in a joint submission signed by over 100 households from the Dunalley area, plus 13 individual submissions, were disregarded. By contrast only 20 individual submissions were made by people from the Carlton River area, with 6 suggestions made by a single resident accepted.		
47	In the discussion at the forum it was stated that every proposal made by residents had to be followed up, but clearly SECLA's suggestions were not or were eliminated from the beginning under Airservices's assessment criteria. This seems to me a very objective way of assessment.		



#	Comment	Airservices Response	PIR Report Changes
10	Preference of non flight path over Sorell and Richmond. Sea approach with less impact on communities is better than previous arrangements.	Thank you for your feedback, your comments have been recorded as part of the PIR.	
35 38 40 3 28	When evaluating suggestions, Airservices has not taken account of new surveillance technology being implemented in March 2022. The new technology allows for efficiency gains such as reducing separation minima to shorten both jet departures and arrivals, allowing traffic to be spread more widely and closer to previously overflown communities near the airport.  Why are there no alternatives for the runway 12 SID departure?  And finally, why are there no options for the RWY12 SID departure?  The 'fact sheet' for community suggested alternatives stated which paths 'could not be moved' and the RWY12 SID was not one of them, yet there are no options for this path. Surely with the increased surveillance that is coming to the airport in March, this path could be moved closer to the airport?  This is supposed to be a 'performance' review yet the Non-jet RWY12 SID (which has had the most performance issues) and the Jet RWY12 SID, which has unnecessary track miles have not even been considered or given options.	Flight path procedures for Hobart Airport are designed to provide both procedural separation (where separation of aircraft is built into the flight path design) and surveillance separation (where radar systems are used by air traffic controllers to separate aircraft). The current minimum requirement for procedural and surveillance separation at Hobart is 5NM (Nautical Miles).  At this time, a reduction to the current 5NM separation standard is not possible at Hobart due to the surveillance equipment being used and the large scale of airspace that air traffic controllers are viewing for Hobart operations.  There may be the potential for a reduction of the 5NM separation standard in the future, if, for example, there is a change to procedural and/or surveillance standards or radar surveillance equipment. However, there are no changes anticipated in Hobart in the near future and the current separation standard will therefore remain in place.  There were 10 assessment scenarios for changes to the Runway 12 jet or non-jet Standard Instrument Departure (SID) flight paths that were identified from the community suggested alternative submissions. The assessments of these suggestions are presented in Appendix G of the PIR report (see sections G.2.9 - G.2.15). None of these scenarios were recommended to progress for further assessment due to the inability to adequately separate jet and non-jet aircraft departures to the required 5NM standard.	New section G.1.2 added to include the information provided in this response.
41	This identifiers for the PIRs are inadequate - hard to know which ones are which without more locality information.	The images used in the PIR report to display suggested flight path alternatives were either provided as part of a	Section G.1.1 updated to note that the images



#	Comment	Airservices Response	PIR Report Changes
		submission, used in previous consultation activities, or are concept locations overlayed on Google Earth imagery. They intend to show an indicative location for each flight path alternative that is being assessed.  The PIR identified seven community and industry suggested flight path alternatives that will now be subject to further design, safety and environmental assessments, and community and industry engagement prior to a decision on implementation being made. The design and assessment process will confirm the location of each suggested alternative and clear images and information will be shared with the community during engagement. You will have the opportunity to comment on all proposed alternatives during this consultation.	used for the assessment of the community suggested alternatives have come from a variety of different sources and are intended to show an indicative location for assessment purposes only
9	Zero consideration appears to have been made for the fact that most flight paths (current or proposed) pass over or near the second largest shooting range in southern Tasmania, SSAA Blue Hills - located at Copping.	Our environmental change management processes include consideration of 'noise sensitive receivers', which are places where sensitivities to the effects of noise are likely to be experienced. They are specified as noise sensitive developments in <i>Australian Standard AS2021:2015 Acoustics – Aircraft noise intrusion – Building siting and construction</i> and include residential buildings, education establishments, offices, hospitals, aged care facilities, churches, religious activities, theatres, cinemas, recording studios, court houses, libraries and galleries.  The SSAA Blue Hills Sporting Shooters Club is not considered a noise sensitive receiver and has not been declared as a Danger Area <sup>7</sup> by the CASA Office of Airspace Regulation.	

<sup>&</sup>lt;sup>7</sup> A Danger Area is designated by CASA where an activity within or over the area is a potential danger to aircraft flying over the area



#	Comment	Airservices Response	PIR Report Changes
		The PIR aims to identify any safe and feasible flight path alternatives that may improve operations and/or noise outcomes for the community. The proposed flight path alternatives that are recommended to progress will now be subject to further design, safety and environmental assessments, and community and industry engagement prior to a decision on implementation being made. The SSAA Blue Hills Sporting Shooters Club will have the opportunity to comment on all proposed alternatives during this consultation.	
35 38 40 46	The Airservices team did not consider the feedback provided in SECLA's joint submission regarding impact on the Dunalley area. Rather than looking at factors such as ambient noise and the cost of noise to tourism businesses and the local economy, the report takes an overly simplistic view by counting households directly under the flight line – an approach criticised by the ANO in her 2017 report (evidently not read by Airservices) which disadvantages communities with low population density.  It should also be noted that the Scenario 1 reference to the number of dwellings overflown appears to be a significant underestimation. This error was acknowledged by representatives of Air Services Australia in the course of the community consultation meeting at Wrest Point on 13 November 2021.	We have considered and reviewed all feedback received throughout the PIR. We are committed to proactive, open and transparent consultation with all stakeholders, including the community.  There are seven community and industry suggested flight path alternatives that will now be subject to further design, safety and environmental assessments, and community and industry engagement prior to a decision on implementation being made. You will have the opportunity to comment on all proposed alternatives during this consultation  We have also reviewed and accepted all of the recommendations from the Aircraft Noise Ombudsman's (ANO) investigation into complaints about the introduction of new flight paths into Hobart. The Airservices response to the ANO's recommendations is included in the published ANO	New section – Appendix K: Flight Path Change Process – added to provide information on the next steps for the community and industry suggested flight path alternatives that have been recommended to progress for further assessment.
		report (see <a href="https://ano.gov.au/reportsstats/">https://ano.gov.au/reportsstats/</a> ).  The assessment of flight path alternatives submitted as part of the PIR was completed as a desktop review and considered each suggestion against four key elements: safety and operational compliance; operational efficiency and feasibility; environmental; and network. The assessment criteria is detailed in Section G.1.1 of the PIR report. The	



#	Comment	Airservices Response	PIR Report Changes
		environmental element included consideration of noise resulting from aircraft operations and the number of people impacted.	
		The PIR applied a one-kilometre buffer (500 metres either side of the indicative flight track) for the desktop assessment of each suggestion to determine the number of residential dwellings and other sensitive sites that may be overflown by the flight path suggestion. This was to provide a consistent 'apples with apples' comparison of each suggestion and was not intended to determine the full extent of potential noise impacts.	
		Section G.1.1 of the PIR report notes that the desktop review of the suggested flight path alternatives does not consider the altitude of the aircraft, frequency of flights or noise levels. The PIR review is aiming to determine which suggestions are safe and operationally feasible so these can move forward to a more detailed assessment, including noise modelling.	
47	Three proposals have been chosen for further investigation; all suggested by community members, who are not experts at all. I find it very distressing that Airservices relies on ideas from the public rather than trying to improve their own design.	The scope of the Hobart PIR was developed in consultation with the community and included the opportunity for the community and industry to make flight path change suggestions.	
		Our commitment is to ensure our engagement with communities who may be affected by proposed changes to flight paths and airspace is proactive, open, and transparent.	
		We welcome and regularly investigate community suggested alternatives to the operation of the flight paths and procedures we have implemented, with the aim of improving noise outcomes for the community.	
		In addition, we conduct our own internal reviews to determine improvement opportunities, and we rely on	



#	Comment	Airservices Response	PIR Report Changes
		community feedback and operational data on aircraft noise impacts to inform this activity.	
		The PIR identified seven community and industry suggested flight path alternatives that will now be subject to further design, safety and environmental assessments, and community and industry engagement prior to a decision on implementation being made. You will have the opportunity to comment on all proposed alternatives during this consultation.	
48	Attached are documents from Primrose Sands residents stating their preferences to flight path options re Hobart Airport.	Support for Recommended Actions 4, 5 and 6 is noted. There are seven community and industry suggested flight path alternatives that will now be subject to further design, safety and environmental assessments, and community and industry engagement prior to a decision on implementation being made. You will have the opportunity to comment on all proposed alternatives during this consultation.	

#### 2.6.1. Recommended Action #4 (move the RWY30 RNP-AR 2-3kms east)

#	Comment	Airservices Response	PIR Report Changes
8	Thank you for conducting a through detailed review. I strongly support the recommendation to move the arrivals runway east by 2-3klms.	Thank you for your feedback.  Support for Recommended Action 4 (for Airservices to undertake further assessment of the community suggested	
15	I have a shack at Primrose Sands. My partner and I purchased this property 15 years ago to enjoy some peace and quiet in a natural environment. Since the changes to the flight path this peace has been shattered. Aircraft fly straight over our property at a very low altitude (we can clearly see the logo and name of the company). We received no information or opportunity to comment on the changes before they were introduced. We support the proposal to move the flight path 2-3 kilometres to the east where	change to move the RWY30 RNP-AR STAR 2-3 km to the east) is noted.  We need to manage the impacts of aviation activities, and this requires a careful balance of ensuring safety, operational efficiency, protecting the environment and minimising the	



#	Comment	Airservices Response	PIR Report Changes
16	few homes are impacted, and hope that common sense will prevail.  As our suggestion of a second arrivals smart track will not progress, we want the RNP-AR track currently over our house, moved. We were not contacted or consulted by Airservices or given the opportunity to voice our opinion before this arrivals flight path was moved over Carlton/Primrose. Airservices acknowledge that its community consultation in relation to the Hobart flight path changes has been "inadequate".  Airservices acknowledge there have been more flights over Carlton/Carlton River and Primrose Sands than anticipated (even during the pandemic) due to the increased use of the fixed visual approach and the increased uptake of RNP-AR technology by aircraft operators. Airservices also acknowledge this trend is expected to continue as more aircraft become equipped with RNP-AR technology and aircraft operators increasingly focus on fuel burn costs and emissions.  In an attempt to improve noise outcomes for communities under the RWY30 RNP-AR arrivals track, Airservices are considering a NAP change to specify preferred runway use at sensitive times of the day – eg. RWY30 RNP-AR would only be used during the day (9am – 5pm). Although this suggestion is appreciated, we don't believe it goes far enough to alleviate the noise and visual impacts currently experienced by residents of the densely populated areas of Carlton/Carlton River and Primrose Sands. Therefore we fully support the community suggestion to move the RNP-AR track 2 – 3 kilometres to the east. This would mean fewer dwellings are impacted and aircraft would be arriving at a higher altitude than currently experienced. It would also provide a fair compromise for both densely populated communities and industry. This suggestion is recommended to progress for further assessment and we sincerely hope for a favourable outcome.	design, development and decision-making regarding flights paths and their implementation, and considers how we balance the needs of all of our stakeholders.  The PIR identified seven community and industry suggested flight path alternatives that will now be subject to further design, safety and environmental assessments, and community and industry engagement prior to a decision on implementation being made. You will have the opportunity to comment on all proposed alternatives during this consultation.	



#	Comment	Airservices Response	PIR Report Changes
20	Recently heard the CEO of Hobart Airport on the radio sounding very excited about Tasmania's borders reopening soon, with increased arrivals over summer, possibly peaking at 50 on some days (a bit different to the maximum number of 38 previously reported by Airservices). As a lot of these arrivals will be on the RNP-AR track currently over our house, located in a peaceful area of Carlton, for this reason we are not looking forward to our borders re-opening. The RNP-AR arrivals track should not have been placed over such a populated area of the Southern Beaches community. Airservices did not consult us about flight path changes and the first we heard about it was when an aircraft flew over our new home - we were outside at the time and had to yell to hear each other speak! The placement of this flight path shows Airservices make decisions based on industry first and community last. We fully support the community suggestion to move this arrivals path 2-3 klms to the east.		
21	The noise is shocking over hour houses in Carlton River. The flights are due to increase next week to 50 movements a day. We will not have a break from the noise that scares our pets, wakes my baby and disturbs the river bird life. It's been noted that moving the flight path 3km to the left would reduce the number of houses affected by 365 why wouldn't you do that?? Our quality of life is significantly reduced because of the current flight path.		
23	Current flight path is too noisy and too frequent, follow the recommendations and move it a few kms to the east		
24	The planes are very loud and disruptive.  Move the flight path east as per the recommendation		
25	Moving the flight path 3 km to the east That would be nice		



#	Comment	Airservices Response	PIR Report Changes
26	I support moving the flight path 3ks to the east as the area is less populated with more farming land which means less people affected by the noise		
28	This once again can be negated by moving the SMART track slightly to the east and keeping the planes on this path (as indicated in the report).		
42	I support the reccommendation of moving the flight path 3km to the eats to reduce the number of affected properties. I am under the current flight path and the noise level as recognised in the review is loud and happens very often, at times minutes apart.		
43	I supprt the finding in the review of moving the flight path 3km east to reduce the affected properties.		
32	Flights over Campania or Dunalley are far higher up and less obtrusive. Flight paths could be altered to cross between Dunalley and Connolly marsh and track over Frederick Henry bay without disturbing thousands of residences at Carlton river and southern beaches .	Thank you for your feedback.  The PIR identified seven community and industry suggested flight path alternatives that will now be subject to further design, safety and environmental assessments, and community and industry engagement prior to a decision on	
33	Surely, a flying route over Fredrick Henry Bay avoiding Carlton River & Southern Beaches Houses would be a preferred option. There are lots places to cross into the Bay without disturbing residents.	implementation being made. You will have the opportunity to comment on all proposed alternatives during further consultation.  One of these suggestions is the community suggested change to move the RWY30 RNP-AR STAR 2-3 km to the east. The preliminary assessment of this suggestion is provided in Section G.2.3 of the PIR report. The further design work and environmental assessment for the suggestion will determine the appropriate location for the flight path and where it crosses into Frederick Henry Bay.	
45	Here in Murdunna we are always getting noisewhether runway 12 departures or Runway 30 RNAV approaches.	Thank you for your feedback, your comments have been recorded as part of the PIR.	



#	Comment	Airservices Response	PIR Report Changes
	Now we see proposals to move the arrivals via smart tracking even closer to usthis is unacceptable.	The scope of the Hobart PIR was developed in consultation with the community and included the opportunity for the community and industry to make flight path change suggestions.	
		The PIR identified seven community and industry suggested flight path alternatives that were found to be safe and operationally feasible and will now be subject to further design, safety and environmental assessments, and community and industry engagement prior to a decision on implementation being made. You will have the opportunity to comment on all proposed alternatives during this consultation.	
46	Of concern is the community suggested alternative on page 24 of the report, proposing that RWY30 RNP-AR STAR be moved either 1) 2-3km or 2) 7-9km to the east of its current alignment, and that scenario 1 is Air Services Australia's preferred option. If adopted, this will result in the introduction of aircraft noise at Connollys Marsh and Primrose Sands from aircraft arriving at runway 30. This will be in addition to the noise that these residents currently tolerate from aircraft departing from runway 12. In summary, there would be no respite for these residents from jet aircraft noise as they would have aircraft overhead regardless of wind direction. This is not consistent with the aim of noise sharing among communities within the vicinity of Hobart Airport's flight paths, but would result in the concentration of arriving and departing aircraft noise in tightly defined corridors above residents' houses in Primrose Sands and Connollys Marsh. The current alignment of RWY30 RNP-AR STAR results in residences with arriving aircraft overhead in the Carlton area, but not departing jet aircraft. While this isn't ideal, it is nowhere near as invasive has having both arriving and departing jet aircraft noise consistently overhead.	to a decision on implementation of this suggestion. This work will determine the appropriate location for the suggested flight path. You will have the opportunity to comment on this	



#	Comment	Airservices Response	PIR Report Changes
	Whilst not an ideal solution, scenario 2 on page 24 would be less invasive than scenario 1 for Primrose Sands and Connollys Marsh communities. Whilst not articulated in the draft report, it is understood that this option is not supported by Air Services Australia as it overlays the RWY30 RNAV STAR. It is understood that it is desirable to have two arrival options for RWY30, and scenario 2 wouldn't provide this. However, the option of moving the lesser-used RWY30 RNAV STAR to the north east into the current RW30 RNP-AR STAR alignment or alignment proposed for scenario 1 should be explored, as it would have multiple benefits. It would free up airspace to the south east for implementation of the scenario 2 flight path, would maintain two separate arrival options for RWY30, and would decrease the potential noise impact on the residents of Carlton, Primrose Sands and Connollys Marsh. Minor additional CO2 emissions could (and should) be offset by a range of mechanisms.	The PIR assessment of scenario 2 (moving the RNP-AR 7-12km east) identifies that this would place the RNP-AR STAR in the same location as the RNAV STAR and this is inconsistent with the intent of having separate and more difficient procedures for RNP-AR equipped aircraft. The comment regarding swapping the RNP-AR and RNAV STARs would not provide a community benefit as aircraft operators are increasingly focusing on fuel burn costs and emissions, and pilots would continue to seek to use the most difficient route with the least track miles.  However, it is possible to influence the use the two STARs arough a noise abatement procedure (NAP). Recommended action 5 is for further assessment of a potential NAP to pecify preferred runway use at sensitive times of the day, including further community and industry engagement to determine what times of day or night would apply and	
46	In summary, while we appreciate the opportunity to participate in the post implementation review process, we have significant concerns about the recommendation to further investigate the option of moving RWY30 RNP-AR STAR 2-3km to the east. We contend that this will place an unfair noise burden on the residents of Primrose Sands and Connollys Marsh. The option of moving RWY30 RNAV STAR to facilitate the implementation moving RWY30-AR STAR 7-9km to the east should be explored.	operational requirements for exemptions. This suggestion is described in Section G.2.5 and Section I.1 of the PIR report and could potentially provide improved noise outcomes for the Primrose Sands and Connellys Marsh communities.	
18	RECOMMENDATIONS: Apparently 5 suggestions made by the community out of 19 recommendations were found safe and feasible but only 3 were recommended for further assessment. Comments/suggestions in regard to recommended actions on page 7 of the Hobart Airspace Design Review: RECOMMENDED ACTION 4: AS will undertake further assessment of the community suggested change of moving the RWY30RNP-ARSTAR 2-3 KMS	All suggestions made by stakeholders, including the community, were reviewed and assessed as part of the PIR. The PIR aims to identify any safe and feasible flight path alternatives that may improve operations and/or noise outcomes for the community. Applying this lens, the PIR identified five community suggested alternatives that were found to be safe and feasible, with three suggestions recommended to progress for further assessment. Two	



# Comment	Airservices Response	PIR Report Changes
TO THE EAST: AS has admitted that Primrose Sands and therefor my immediate area that "noise events above 60 dBA were higher than estimated" and "indicated that all aircraft traffic over this area reaches noise levels of at least 60 dBA" and "on average 2.7 dail events above 70 dBA for the PIR summer and an average of 4.5 daily events during the PIR winter period." It was also stated on page 20 that "in particular, there was higher than expected use of the RWY30RNP-ARSTAR." AS received two suggestions in regard to this: 1. Moving the Star 2 - 3 kms to the east and 2. Moving the STAR 7 - 9 kms to the east. Scenario 1 " reduces the number of residential dwellings overflown from 380 to 15." The assessment outcome by AS was "safe and feasible and is recommended to progress for further assessment." Scenario 2 "concentrates all RWY30 arrivals on the RNAV STAR location and results in a single STAR to RWY30." The assessment outcome by AS was also "safe and feasible, however is not recommended to progress for further assessment as the objectives of the suggestion are better achieved by Scenario 1." I agree with both of these suggestions as it provides a really reall great outcome for the Primrose Sands community and I am hoping for myself and for my neighbours. However, my neighbours and I, REQUIRE CLARIFICATION from AS as to WHERE THE STAR RELOCATION WILL COMMENCE FROM. If it commences from waypoint BAVUW THEN MY NEIGHBOURS AND I DO NOT RECEIVE ANY BENEFIT FROM THIS CHANGE AT ALL. To achieve great results for everyone I suggest starting this new STAR path 2 - 3 kms to the east of BAVUW's current location that is in the forest and does not impact anyone. Surely relocating BAVUW this short distance cannot cause major turmoil but will in turn bring about great relief and benefits for a community that have suffered drastically since the current flight path was	One of the suggestions that was found to be safe and notionally feasible, but not recommended to progress, is the suggestion to move the RWY30 RNP-AR and RNAV STARs (and therefore waypoint BAVUR) to the east. The preliminary assessment of this suggestion is provided in Section G.2.7 of the PIR report and identifies that the change would result in additional track miles (and therefore fuel burn and emissions) for industry while resulting in a similar number of dwellings being overflown.  The preliminary assessment of the suggestion to move the RWY30 RNP-AR STAR to the east is provided in Section G.2.3 of the PIR report. Neither of the scenarios assessed (moving the STAR 2-3kms or 7-9km to the east) requires the relocation of waypoint BAVUR.  The PIR identifies seven community and industry suggested flight path alternatives that will now be subject to further design, safety and environmental assessments, and community and industry engagement prior to a decision on implementation being made. None of these suggestions require the relocation of waypoint BAVUR. You will have the opportunity to comment on all proposed alternatives during this consultation.  The suggestion to move the RNP-AR STAR 4-5kms to the east was not received as part of the PIR and has therefore not been separately assessed. Further design and an	



#	Comment	Airservices Response	PIR Report Changes
	introduced in 2019. My neighbours and I have suffered drastically from debilitating noise since 2019 and before this since September 2017 with departures flying directly over our residences and at a far lower altitude than they currently fly over residences now when departing.		
	My other suggestion is splitting the difference in distance and moving the STAR 4 - 5 kms to the east. Also moving the location of BAVUW as the starting point. This is near the area of the Red Hills and there is virtually no residents in this area and therefore has to be beneficial for everyone.  As both these scenarios were deemed plausible by AS I support both of these and hope that my neighbours and I also RECEIVE BENEFIT from the change but as previously stated I require CLARIFICATION FROM AS that this will in fact PROVIDE RELIEF for me.		
18	If AS agrees to moving the smart track 2 - 3 kms or even 4 - 5 kms to the east will this flight path still track from BAVUW's current position or will BAVUW be moved? If BAVUW is not moved is it correct that once again MY NEIGHBOURS AND I WILL RECEIVE NO NOISE RELIEF AT ALL? AS has stated that moving the smart track to the east will reduce the number of residents overflown from 380 to 15. Once again I require CLARIFICATION if my neighbours and I WILL BENEFIT? BAVUW NEEDS TO BE MOVED.		

#### 2.6.2. Recommended Action #5 (Noise Abatement Procedure)

#	Comment	Airservices Response	PIR Report Changes
18	My suggestion to AS to relieve a current grievance would be to introduce Recommended Action 5 immediately or ASAP.	Thank you for your feedback. Support for Recommended Action 5 is noted.	
		The PIR identified seven community and industry suggested flight path alternatives that will now be subject to further	



#	Comment	Airservices Response	PIR Report Changes
		design, safety and environmental assessments, and community and industry engagement prior to a decision on implementation being made. You will have the opportunity to comment on all proposed alternatives during this consultation.	
28	The suggestion for the NAP's is unfair and against flight path principles.  The area that the RWY30 RNAV STAR uses is in the area where most impact for noise has occurred.  There is already a departure SID (RWY12) that uses this exacts airspace. How can it be fair to increase the number of flights in this area? It is against flight path principles in that you shouldn't have communities that are impacted by flight paths on arrival and on departure, this is what is happening now, and this suggestion would only increase the noise problems.  The area has very little ambient noise, as shown by the noise monitoring at Connellys Marsh. The noise levels have exceeded the levels predicted in the modelling. By having more planes in the area when the area is at its quietest, morning and evening, is absolutely ridiculous.	Recommended Action 5 is for further assessment of a potential Noise Abatement Procedures (NAPs) change to specify preferred runway use at sensitive times of the day, including further community and industry engagement to determine what times of day or night would apply and operational requirements for exemptions.  This suggestion will now be subject to environmental assessment and community and industry engagement prior to any decision to implement being made. Our <i>Flight Paths Design Principles</i> will be applied through this process.  Noise modelling is an assessment of possible noise outcomes based on the best available information at the time. It is not a guaranteed maximum level. Section A.9 of the PIR report describes how the noise model for Hobart has been calibrated with the short-term noise monitoring	
45	Another proposal to use the RNAV runway 30 approach at night and early mornings? This is just adding to the impost on our communities.	undertaken for the PIR, and this updated noise model will be used for the environmental assessment of the relevant community and industry suggestions. It is important to note that being identified through the PIR for further assessment does not mean that the suggested alternative will be implemented – the outcomes of the environmental assessment and community engagement will be central to this decision making.	
18	RECOMMENDATION ACTION 5; AS assessed as "results in improved noise outcomes (night time respite) for communities under the RWY30RNP-AR STAR" and "could be achieved through a NAPs requirement for the	The PIR identifies a recommended action (Recommended Action 5) for further assessment of a potential Noise Abatement Procedure (NAP) to specify preferred runway use at sensitive times of the day, including further community and	



#	Comment	Airservices Response	PIR Report Changes
	RNAVSTAR to be the preferred RWY30 at night." AS Outcome: "Potential NAPs change is safe and feasible and is recommended to progress for further assessment." If a permanent relocation under recommendation 4 cannot be achieved I believe this to be a brilliant recommendation and provide great relief for EVERYONE on this STAR path. However, I also REQUIRE CLARIFICATION, as do my neighbours, as to WHERE THIS WILL COMMENCE FROM. On page 25 AS stated: "Further investigation will be undertaken to determine an appropriate location for the STAR starting point." This would provide great relief to my neighbours and I as it will to all residents currently under the STAR path. As stated previously I experience plane noise for 17 - 18 hours a day so the period I suggest this diversion commences from is 6pm until 6am. From 6pm of an evening the STAR path is extremely busy and extremely noisy and having given up my peace and tranquility throughout the day I believe I and all community members are entitled to some quality, peaceful home time during the evening. My questions to AS are: Will the reduced use of the smart track at night assist all residents including my neighbours and I or will aircraft still track to BAVUW and therefore provide NO RELIEF TO MY NEIGHBOURS AND I?	industry engagement to determine what times of day or night would apply and operational requirements for exemptions.  This NAP suggestion could provide improved noise outcomes for your area as aircraft arriving from the north onto the RWY30 RNAV STAR would not track via BAVUR, however all arrivals from the north-west to the RWY30 RNAV STAR would continue to track via BAVUR. This NAP does not require the relocation of any flight paths or waypoint BAVUR.  The quote from page 25 of the PIR report is for Recommended Action 6, which is for Airservices to undertake further investigation of the community suggested flight path change to move RWY30 arrivals to the east coast (over water) to determine an appropriate STAR starting waypoint and validate the track miles assessment. This is not related to the suggested NAP.	

#### 2.6.3. Recommended Actions #6 to #10 (east coast and Air New Zealand routes)

#	Comment	Airservices Response	PIR Report Changes
3	Have you not even looked at the previous community consultation?	Thank you for taking the time to provide feedback and contribute to the Hobart PIR.	Appendix G (Community Suggested Alternatives) updated to acknowledge that the PIR has assessed every flight path change
	All the feasible options have already been explored, the community rejected the over water eastern flight paths for departures and arrivals. It looks like no real investigation was undertaken (again). The areas east of the airport are tourist		



#	Comment	Airservices Response	PIR Report Changes
	destinations prized for the peace and quiet. This PIR is embarrassing as it highlights the lack of proper understanding of the impacts of these flight paths. Its not about the number of people impacted, its about where you live, and if you live close to an airport you should expect aircraft noise.  MOVE THE PATHS CLOSER TO THE AIRPORT. As for the New Zealand departures, what a joke, one of the scenarios flies nearly over Eaglehawk Neck, that's ridiculous.  NONE of the scenarios are feasible for anyone who live in the south east area.	community, and are proactive and open in sharing information on our decision-making process.  The scope of the Hobart PIR was developed in consultation with the community and included the opportunity for the community and industry to make flight path change suggestions. The PIR has therefore assessed every flight path change suggestion that was submitted during the public comment period, including suggestions for flight path changes that have been considered and disregarded previously.	suggestion that was submitted during the public comment period, including suggestions for flight path changes that have been considered and disregarded previously.  Section G.2.6 updated to acknowledge previous consultation on over water flights along the east coast, including the Stakeholder Reference Group.
17	I am extremely concerned about submitted proposals to move any flight paths further to the East. Boomer Bay is already being heavily impacted by the changes that were imposed without any consultation in 2017. While I appreciate noise must be shared, I believe we are already receiving our fair share given we were not previously overflown (despite AS comments to the contrary). I cannot believe that the over-water East Coast route is being reconsidered after it has been heavily scrutinised already, and rejected by industry and the community. The impact to the whole Lower East Coast would be significant as aircraft noise reflected off the water and rolled into the coastline. We are already impacted to the West - an East Coast route would mean we are surrounded by noise at Boomer Bay - so named because of the sound-reflective nature of the area where the surf from Marion Bay can be heard transmitted down through Blackman and Boomer Bays. Aircraft noise just reverberates off the surrounding hills. Please don't completely ruin this area.	A submission was received that identified the east coast over-water route as a flight path alternative for consideration, and the preliminary assessment (described in G.2.6 of the PIR report) found this alternative to be notionally safe and feasible.  In addition, Air New Zealand commenced flights into Hobart in April 2021, and requested new flight routes to reduce track miles (and therefore fuel burn and emissions) and achieve greater time efficiencies for flights between New Zealand and Hobart. The preliminary assessments of these suggestions are provided in Appendix H of the PIR report.  There are seven suggested flight path alternatives, including the Air New Zealand requested changes, that are recommended to progress for further assessment. These suggestions will now be subject to further design, safety and environmental assessments, and community and industry engagement prior to a decision on implementation being	
19	1. Don't move SID further east or 2. don't consider east coast route. You can't seriously be suggesting you are going to consider these 2 options again after the feedback you received and the stress and disruption to peoples lives you have caused.	made.  It is important to note that being identified through the PIR as safe and feasible does not mean that the suggested alternative will be implemented – the outcomes of the	



#	Comment	Airservices Response	PIR Report Changes
	3. Don't put a new flight path to / from New Zealand over Marion Bay.	environmental assessment and community engagement will be central to this decision making.	
27	I am against the re alignment of departures over Norfolk Bay. They are already impacting communities not previously overflown, Dunalley, Murdunna, [identifier removed]. I am concerned about the new proposed Air New Zealand flight paths over Norfolk Baythis would impact newly overflown communities including [identifier removed] where I live	You will have the opportunity to comment on all proposed alternatives during this consultation. Community consultation activities will be communicated widely, including direct notification to everyone registered for Hobart updates through <i>Engage Airservices</i> , local government authorities, elected members, the Hobart Airport Community Aviation Consultation Group and the media. Community members and noise sensitive sites that may be affected by the suggested changes will also be targeted through this engagement.	
27	In the case of the Eastern approach over Dunalley I am appalled that a path overwhelmingly rejected is entertained again because ONE person put it forward.  The takeoffs of runway 12 are noisy now, moving arrivals to Norfolk Bay is an additional impost over the same communities. The community of carlton River, Dodges Ferry often get no aircraft noise at all, since they only get arrivals, whereas those of us at Dunalley, [identifier removed] are getting either arrivals or departures EVERY day.  Moving the arrivals further east does not noise share.  The only respite Dunalley and Murdunna get is on the Smarttrack approaches.  I urge AS to simply leave it all alonewe at [identifier removed] will put up with the 70 db take offswhich we did not get before.		
27	The east coast approach is ridiculous. The ANZ southern departure is ridiculous, to argue cost savings to a foreign airline at the expense of our communities is cronyism. Let us have some common sense and just leave it as it as?		
28	The flight path option along the east coast has been exhaustively consulted on and was rejected, it is disgraceful that this has even been suggested as an alternative.  This suggestion was only mentioned by one community member and was stated in an off-hand way.		



#	Comment	Airservices Response	PIR Report Changes
	Some history on the east coast path, as it seems that no		
	investigation was undertaken as this option would have been		
	classed as NOT feasible.		
	The east coast flight path will impact Freycinet, Maria Island,  Maria Barrand Barrand Barrand State of St		
	Marion Bay and Bangor – all areas of significant cultural, heritage and tourism value.		
	The point where this flight path crosses land is the location		
	where Abel Tasman first anchored in Tasmania.		
	It is the site of one of the first contacts between Europeans and		
	Aboriginals and where of the Pydairrerme Band Aboriginal Tribe		
	lived a traditional lifestyle.		
	Bangor is a covenanted conservation site valued for its natural		
	beauty and diversity.		
	This area has been targeted for the rehabilitation of the		
	Tasmanian Devil, with the area now hosting one of the largest		
	and healthiest numbers of devils after the decimation of them by		
	the Devil facial tumour disease (DFTD).		
	<ul> <li>The site also has a large vineyard with the very popular Bangor</li> </ul>		
	Vineyard Shed.		
	• The path would also fly over the town of Dunalley, which		
	includes the local primary school, The Dunalley Hotel and other		
	commercial businesses.		
	A new 150 berth Marina with Restaurants and accommodation will be directly ever flows by this path.		
	will be directly over flown by this path  The new Dunalley Gin Distillery and café will be directly over-		
	flown by this path.		
	This path increase the track miles.		
	This area has NEVER had planes before.		
	And most of all, this area has already gone through consultation		
	for this option and it was rejected, nothing has changed since		
	then.		
	These are just a few points that I can remember off the top of my		
	head.		



#	Comment	Airservices Response	PIR Report Changes
	The suggestion that the SMART track be moved slightly to the east will negate the need for an east coast flight path.		
28	The communities that have been impacted by these flight paths, that were put in place with NO COMMUNITY CONSULTATION, have been dealing with this issue since September 2017. We are tired of the constant 'goal post moving'. It is disrespectful and hurtful to have to constantly fight for your right to live in peace. What is the point of community consultation when Airservices just re-hashes the paths that have already been consulted on (east coast option). Please get this right and look through the consultation history properly, this is not a numbers games, people choose a lifestyle, amenity and where they want to live, to be 40-60km away from the airport and have more plane noise that if you live 5-10km from an airport is wrong.		
30	I have read the submission from South East Coast Lifestyle Association (SECLA) and I fully endorse their feedback. Taking action to make drastic changes to the current flight paths based on the feedback of a handful of people, whilst ignoring so many others, makes a mockery of the drawn-out consultation process previously undertaken. Such changes as shifting large amounts of air traffic further east and south (over Maria Island and Murdunna) should require another lengthy consultation process which would also involve the community is a chance to, once again, explore all the options.		
31	I am a resident of Marion Bay and I'm dismayed to see that suggestion G2.6 is back up for consideration. As previously detailed so eloquently in Appendix J Submission 30, there are a large number of reasons why this should not proceed. We have all chosen to live in this area primarily for the peace and quiet, and the impact of plane noise is amplified compared to those residential areas that already have a much higher level of ambient suburban noise. The inconvenience of living so far from Hobart		



#	Comment	Airservices Response	PIR Report Changes
	is vastly outweighed by the peaceful and quiet environment we live in out here, yet you propose to change this and affect our lives.  In my previous home in Brisbane we were under a flight path that was implemented without consultation and after 10 years of hearing only the occasional plane we were suddenly inundated with aircraft noise including international takeoffs that rattled our windows. The planes went overhead every 3-5 minutes. The impact on our lives was significant. We had to stop talking whenever a plane went overhead and it affected our sleep and our property value. Whilst obviously there would be far less plans under proposal 2.6, I am extremely anxious that our quiet nature haven will be affected by aircraft noise pollution. One of the primary considerations for our purchase at Marion Bay was that the area was not impacted by planes overhead, yet suddenly we are faced with that again. I refer you again to the recommended alternatives cited in Submission 30 which I remind you is a representation of a large number of residents opposing the suggestion to move the flight path over this area.		
38 40	The East Coast arrival route has been resurrected, after being rejected previously as having adverse environmental impact – and despite Airservices acknowledging it as potentially less safe and less efficient. This creates considerable anxiety in a never previously overflown community which has been consulted about this issue multiple times by Airservices since 2017, and now experiences 45 flights per day. Imposing this cost on an already overburdened community is unreasonable and unfair.		
39	[Identifier removed] operate an experiential nature based adventure tourism business on Bangor and the Forestier Peninsula opposite Dunalley. This property is located directly beneath the proposed departure path runway 12 near Connellys Marsh. My guests are specifically drawn to the scenic, historic and		



#	Comment	Airservices Response	PIR Report Changes
	natural heritage values of this iconic Tasmanian property. Air		
	traffic with its associated noise pollution and visual impact as it		
	travels over Boomer Bay above Bangor will undermine the		
	product and environment that is the basis for my business.		
	I appreciate that my clients fly to Tasmania and that we need to		
	accommodate change in the air transport services we rely on.		
	However, this important decision needs to take into consideration		
	the views of the community and the Tasmanian tourism brand		
	values that underpin the unique natural and cultural experiences		
	that Tasmania represents.		
	The Tasmanian Premier and Minister for Tourism launched		
	[identifier removed] at Bangor in 2017, an event that was		
	highlighted in the media as a showcase for the type of tourism		
	that Tasmania can offer the world. Soon after this event [identifier		
	removed] delivered our signature Bangor experience for visiting journalists at the opening of [identifier removed]. [Identifier		
	removed] chose Bangor to share with visiting journalists because		
	of the power it holds in the Tasmanian story. We specialise in		
	sharing unique Tasmanian stories through the medium of		
	adventure, and we work closely with high end travel agents that		
	are able to recommend my product because of its high quality		
	and unspoiled nature.		
	Bangor is a site of international cultural and natural heritage		
	significance. The unintended consequence of implementing of the		
	air services runway 12 departure route will severely damage the		
	cultural heritage values of the site of first European contact with		
	the East Coast of Australia by Abel Tasman in 1642 and the first		
	point of contact between Aboriginal Tasmanians and Europeans		
	in 1772.		
	As a business and member of the Tasmanian tourism community		
	I am seeking a flight departure path that does not impact		
	businesses and communities that depend on the soundscape and		
	natural values of Blackman Bay, Bangor and the Forestier		
	Peninsula.		
	Below are testimonials from [identifier removed] guests that speak		



#	Comment	Airservices Response	PIR Report Changes
	to the importance of a natural soundscape in the experience they had whilst on Bangor. Please contact me for further discussion		
44	We are writing in response to the resurrection of the proposed East Coast flight path into Hobart airport. This is a path that was already investigated and rejected in 2019, when it was met with overwhelming community opposition. It is disappointing to see the proposal again being considered as part of the current Hobart PIR Report. We urge you to once again reject this proposal.  The following is our submission from December 2018 when the East Coast route was proposed originally. The reasons to reject the proposal are just as valid now as they were at that time. We are extremely distressed to see the proposed addition of a new flight path, tracking down the east coast of Tasmania, returning over land at Lagoon Bay, at the eastern end of Bangor. This route traverses the entire length of our property, including above our house and the [identifier removed]. This will result in up to 15 aircraft per day directly overflying us, a figure that is certain to grow as visitor numbers to Tasmania increase.  The current flight path near Dunalley (which will be retained for most flights), already creates a significant disturbance to us and our guests at [identifier removed] at the western end of the property. The addition of the proposed eastern path will result in our entire property being noisily overflown. It will also mean Dunalley is surrounded by two separate flight paths, a significantly worse situation than the current flight paths, which are bad enough.  Our property Bangor, will be entirely overflown by the proposed east coast flightpath About Bangor  Bangor is a 6000 hectare farm that our family has been custodians of for over 130 years – we are the 5th generation to		
	live and work here. It is a tranquil, beautiful and historic place.		



#	Comment	Airservices Response	PIR Report Changes
	This place is not, as stated in previous Airservices documentation		
	related to an eastern flightpath, simply "vacant farmland and		
	forest".		
	Bangor is home to some of Tasmania's most important heritage.		
	This includes Tasman Bay, where the Dutch flag was hoisted by		
	Abel Tasman's expedition in 1642, the first Europenas to visit		
	Tasmania. Also North Bay, the site of first encounter between		
	Europeans and Tasmanian Aboriginals in 1772. These special		
	places have been managed by our family for 130 years, and they		
	remain undisturbed, in much the same condition today as they were in Abel Tasman's time. As well, we have 2000 ha of nature		
	conservation reserves, recognizing that Bangor is home to some		
	of the rarest plants and animals in Tasmania.		
	Our tourism business and the effect of flight paths		
	Bangor is where we live and work. Seven years ago, we made a		
	significant investment to establish a vineyard and successful		
	tourism and function business, [identifier removed]. We have		
	worked extremely hard to build this into an attraction which hosts		
	50,000 visitors annually. We currently employ over 30 staff, and		
	contribute over \$2 million to our local community.		
	The current flight path, abruptly relocated over Dunalley in 2017,		
	creates a significant level of disturbance to our guests. What used		
	to be a tranquil rural setting is now overflown by up to 45 aircraft		
	each day.		
	Guests at [identifier removed] – currently overflown by aircraft		
	above Dunalley		
	As part of this business, we have developed exclusive guest		
	experiences at Lagoon Bay at the eastern end of Bangor, directly		
	beneath Airservices proposed eastern flight path. The experience		
	we offer is unique - some groups spend over \$100,000 for an		
	exclusive experience unrivalled by anything available. Our guests		
	are immersed in their surroundings, enjoying the best of Tasmanian storytelling, history, scenery, food and wine, the very		
	things which make Tasmania such an attractive place to visit.		
	However, it is completely reliant on the tranquility and remoteness		



#	Comment	Airservices Response	PIR Report Changes
	of this special place, and is incompatible with the presence of dozens of overflying aircraft each day. The relocation of a flightpath over this place will make it impossible to offer this experience to our guests, completely destroying the business we have worked so hard to establish. This will be devastating to us. Lagoon Bay, Bangor, is where the proposed eastern flight path will overfly. Our business relies on the tranquility and beauty of this special place.  Our guest experiences at Lagoon Bay also involve many other tourism businesses, including ecotourism operators, local food and beverage producers, transport, and our local aboriginal community. The loss of our business as a result of overflying aircraft will affect them too. The waters and area adjacent to Bangor's coastline including Maria Island, host many of Tasmania's most well known tourism operations, and these too will be affected by the proposed East Coast flight path. Guests enjoying Bangor's Lagoon Bay experience Since Airservices began community consultation late last year, we have been Lago with the process, as stakeholders who are severely impacted by the new and proposed flight paths. We have provided feedback at the most recent round of community meetings. However, at no time has anyone from Airservices visited our property to get a proper appreciation of the effect the overflying aircraft have on our home and business.  As Airservices CEO, we invite you and your team to visit Bangor, and experience for yourself the beauty and tranqulity of our property. It is important that you visit to get a full appreciation of the landscape we manage, our business we have worked so hard to build, and the effect that overflying aircraft will have. Bangor is a 45 minutes drive from Hobart Airport. We look forward to hearing from you in order to arrange a visit at a time convenient to you.		
	Please contact us if we can provide you with any further		



#	Comment	Airservices Response	PIR Report Changes
	information about Bangor, our business, or how the current and proposed flight paths affect us.		
45	I am completely against the re visitting of the east coast approach over Dunnaley and Norfolk Bay. I made it clear last time that this was not acceptable. I now see an additional suggestion of NEW flight paths over Norfolk Baythis is an aweful suggestion and does not merit considerationtoo many oversights and a deceptive way for Air Services to put to the public. An airline's inconvenience is irrelevant when communities are asked to pay for dramatic loss of amenity.		
18	RECOMMENDATION ACTION 6: AS will undertake further investigation of the community suggested flight path change to move RWY30 arrivals to the east coast (over water) to determine an appropriate STAR starting waypoint and validate the track miles assessment. AS states: "Assessment outcome is safe and notionally feasible. Further investigation will be undertaken to determine an appropriate location for the STAR starting point and validate the associated track miles assessment." On page 25 a map shows RWY30 moving to the east coast. Which is the preferred path - the yellow or the green? If it is the green then will I not be NEGATIVELY IMPACTED AGAIN? Will either of these routes involve TRACKING TO BAVUW? I am unclear as to whether the entire RWY30 arrivals are to move under this recommendation? If this is so then does that mean that neither Primrose Sands, my neighbours and I will have any incoming flights flying over our residence? If I have misinterpreted this how will this recommendation BENEFIT MY COMMUNITY AND I? This recommendation was poorly debated or explained to myself and the Primrose Sands residents at the community	The image presented in the summary table of community suggested alternatives on page 25 of the PIR report identifies the yellow track as the '2018 alternative east coast arrival route'.  The assessment for the community suggested alternative to move RWY30 arrivals to the east coast is provided in Section G.2.6 and identifies that the suggested flight path would be used for arrivals from the east coast of mainland Australia – arrivals from Melbourne and Perth (approx. 2/3 of all arrival flights) would need to continue to use the existing STARs due to excessive track miles to reach the suggested STAR (see Table 37). This could potentially share the RWY30 arrival flights between the suggested east-coast route and the existing RWY30 arrivals routes via waypoint BAVUR.  Recommended Action 6 is for Airservices to undertake further investigation of this community suggested flight path change to determine an appropriate STAR starting waypoint and validate the track miles assessment. The suggested east coast flight path will then be subject to further design, safety and environmental assessments, and community and industry engagement prior to a decision on implementation	



#	Comment	Airservices Response	PIR Report Changes
	session at the Casino due to continual intervention from Dunalley residents.	being made. You will have the opportunity to comment on the proposed alternative during this consultation.	

#### 2.6.4. 'Do nothing'

#	Comment	Airservices Response	PIR Report Changes
11	I have read the recent articles in regards to Hobart flight paths, and the comments following the community consultation. I have also seen comments left on various face book pages. Many of these comments state that people living near the airport/under the flight paths understand the planes have to fly somewhere, and many also actually like the planes going overhead. My wife and I are of the same opinion- the flights even on a busy day are quite tolerable and we don't mind the fact they fly over Primrose Sands. As I alluded to, many other locals, based on on-line comments, also don't mind. There is truth in the saying you can't please everyone; I wish you well with your decision making.	Support for the existing flight paths is noted.	
13	Retain flight paths over / close to Dodges Ferry		
14	I simply wish to say that the current flight paths are very acceptable - noise is minimal over Carlton as the planes are high and those few whingers in the Forcett, Boomer Bay etc area need to get a life		
27	There was no option during consultation toDO NOTHING. The current paths are as expected. Those of us that do not live near the airport and have paid commensurate real estate prices should not be impacted by aircraft noise now. Those in Dodges Ferry, Primrose Sands etc bought knowing that the much lower prices were due to aircraft noise. Plenty of	The PIR aims to identify if the actual outcomes of a change are consistent with what was expected. It also provided the opportunity to consider any safe and feasible flight path alternatives that may improve operations and/or noise outcomes for the community.	



#	Comment	Airservices Response	PIR Report Changes
	propertiess have changed hands during Covid by people who knew what the norm wasand moved on.	Maintaining the current flight paths (i.e. 'do nothing' scenario) was the baseline for the PIR. For example, if no alternative	
35 38 40	In its online feedback form, Airservices did not offer the alternative of leaving flights unchanged – excluding the voice of those content with the status quo, and skewing towards change when this may be unnecessary or undesirable. For example, Airservices's analysis concludes that moving the smart track 2-3 km to the east would advantage 380 dwellings – yet this suggestion came from only 1 person who it appears does not occupy one of those dwellings.	flight path suggestions were received, then no further changes to flight paths would be considered through this review. However, the community and industry did make suggestions for changes, and we need to consider these.  There are seven community and industry suggested flight path alternatives that will now be subject to further design, safety and environmental assessments, and community and industry engagement prior to a decision on implementation being made. Our <i>Flight Paths Design Principles</i> will be applied through this process.  The detailed assessments of these alternatives will be provided to the community and industry for further feedback, noting that the option to 'do nothing' will also be presented at this time.  It is important to note that being identified through the PIR as safe and feasible does not mean that the suggested	
45	please do NOT do any of these suggestions.  We were sold the current changes on the basis that the smart tracking would alleviate arrival noiseso we accepted the runway 12 departures.  Now that is all being betrayed.  I am seriously disappointed with Air Services.  Just leave the paths as they are and please do not hurt us any more.		
46	Alternatively, RWY30 RNP-AR STAR should remain in its current alignment.	alternative will be implemented – the outcomes of environmental assessment and community engagement will be central to this decision making.	
47	The three solutions for further investigation are all just shifting impacts to a neighbouring community rather than finding a stand alone new solution, which does not inflict more noise and visual impacts on others. This also contradicts the new consultation principles. If it cannot be improved by means of not just shifting the problem to someone else, than it should stay the way it is at least.	The publishing of the final PIR report concludes the Hobart Airspace Design Review. The seven suggested flight path alternatives will be progressed for further assessment per the process noted above.	
	This is another point that Airservices has not taken into account; many residents are living with the current situation and don't expect another change that potentially will increase the impact on		

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#	Comment	Airservices Response	PIR Report Changes
	their lives and businesses. A lot of people are not aware that this is still possible with this review.		
	If any of the three proposals really would be implemented, it would be grossly unfair and just be shifting the problem to a neighbour; Realistically than we would need another review of this review and so it goes on. It was hard enough to come to terms with the current flight path implementation, but to now increase the impact even more for us at Marion Bay and surrounding areas. To have more flights at night, arrivals shift 2-3km east and /or arrivals along Maria Island and the East coast would. This is not noise sharing anymore. We are already noise sharing arriving and departing aircrafts. To further increase this with night noise events and /or shifting the STAR 2-3 km closer to the east or even flying arriving aircrafts along the east coast (Maria Island) is madness. We have just built high class tourist accommodation under the impression that the current flight paths are final and cannot be changed anymore. Maria Island is a National Park and a great Tourist asset for Tasmania These peaceful and unique places are the very reason why tourists visit Tasmania.  Aircrafts should be flying as close as possible to airports. Ambient noise levels are lower the further away you are from the airport.		
	There might be less houses further away from the airport, but due to lower ambient noise levels the perception of the noise event has a much greater impact.  We have never been previously overflown.		



### 2.7. Application of Flight Path Design Principles

#	Comment	Airservices Response	PIR Report Changes
18	AS then implemented their new principles in dealing with the community and principles they would abide by but refused to apply these to Hobart Airport flight paths or community members negatively impacted by these flight paths.	The Flight Paths Design Principles guide our design, development and decision-making regarding flights paths and their implementation. They became effective from 1 October 2020, following extensive national stakeholder consultation and public comment. The Hobart Airspace Design Review and associated flight path changes occurred prior to the development of Flight Path Design Principles.  Consistent with our Community Engagement Framework, we seek to be transparent in considering all feedback and sharing information on our decision-making process. The PIR has therefore assessed every flight path change suggestion that was submitted during the public comment period.  The PIR report identifies seven community and industry suggested flight path alternatives that will now be subject to further design, safety and environmental assessments, and community and industry engagement prior to a decision on implementation being made. The Flight Path Design Principles will be applied throughout this process.	
18	AS chose not to use their new flight path principles for the benefit of the residents of the Tasman Peninsula and we are suffering the negative consequences because of this.		
35 38 40	Airservices is considering suggestions that conflict with its Flight Path Design Principles – the proposed Noise Abatement Procedure to require morning and evening arrivals to use the Runway 30 RNAV rather than the smart track would mean the Dunalley area would be impacted by both arrivals and departures. The proposed New Zealand flights over Murdunna would contribute even further to this impact.		
		You will have the opportunity to comment on all proposed alternatives during this consultation.  It is important to note that being identified through the PIR as safe and feasible does not mean that the suggested alternative will be implemented – the outcomes of environmental assessment and community engagement will be central to this decision making.	



### 2.8. Newly overflown assessment

Comment	Airservices Response	PIR Report Changes
My basic personal facts as affected by the 3 FLIGHT PATHS THAT FLY ABOVE OR NEAR MY HOME AND ACROSS MY LAND ARE:  I reside at [address removed], have done so for 35 years, and in regard to flight paths my home is situated directly in front of way point BAVUW, almost directly under the Smart Track now referred to by Air Services (AS) as RW30RNP-AR STAR, very close to the departure track, and very close to the flight path that tracks to Dunalley again near my home and across my land.  I experience in an extremely negative manner the NOISE AND SIGHT OF 3 FLIGHT PATHS.  Prior to 2017, as like most residents on the Tasman Peninsula, I WAS NEVER OVERFLOWN.  I also wish to state here that I served in [removed] for several years and the definition AS attaches to PREVIOUSLY OVERFLOWN is a joke and one I personally believe no court of law would accept as adequate or legally acceptable and I have now taken this issue up with the Commonwealth Ombudsman not the Air Noise Ombudsman who is severely limited by how it can help the community. The ANO has already determined that AS actions in this area are not responsible or reasonable but the ANO is severely limited by their Charter and cannot pursue the issue on behalf of the community any further.	assessment approach was based on noise modelling thresholds to determine areas of interest and then a visual assessment of Airservices flight radar data to determine if there were existing overflights.  The PIR report notes (see Section 7 and Appendix B) that since the original EA was completed in 2018, Airservices has updated its criteria for newly overflown and applies single event noise modelling to assess whether a proposed change is noticeable, and then whether there is currently negligible existing aircraft noise (i.e. less than one overflight per day, during the daytime 6am-11pm).	Per the actions arising from the community information session, Appendix B of the PIR report (review of the newly overflown assessment) has been updated to include: - the size of the geographical land area considered - the number of flights, aircraft types and altitude - a copy of the current (as at February 2022) newly overflown assessment criteria

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#	Comment	Airservices Response	PIR Report Changes
18	AS treated the Tasman Community with contempt for several years when new flight paths were introduced and we were never given the consideration that communities now receive from AS e.g. it was never taken into consideration that we WERE NEVER PREVIOUSLY OVERFLOWN or sharing the noise over a wide flight path so that the same community members are not always disadvantaged so it will be extremely interesting to examine the final flight paths and observe if any consideration has been given to severely aggrieved communities and I class myself as an aggrieved community member.	being made. The current environmental criteria (at the time) will be applied for the assessment of these alternatives.  You will have the opportunity to comment on all proposed alternatives during this consultation. The assessments will be shared with the community as part of the consultation activities.	
35 38 40	The report concludes that the Dunalley area was previously overflown. This contradicts the experience of residents, Airservices' initial environmental assessment and the ANO's 2018 investigation report. The fact that jets occasionally (on average 1 flight per week, as estimated by the ANO on page 15 of her report) used the Runway 30 RNAV is not a reasonable basis to conclude the area was previously overflown.		
36	Your bias report's conclusion is that Dunalley area was previously overflown, however, that was on the basis that 1 flight per week on average flew over Norfolk Bay pre September 2017. That is q1uite a difference to the 45 per day you are currently expecting! NOT GOOD ENOUGH! We want our lives returned to us without ANY flight paths over our properties. If I wanted to buy land over a flight path then the price reflects it. I NEVER purchased my house to have such an invasion of noise and devaluing of my property while you guys make a profit out of flights!		



#	Comment	Airservices Response	PIR Report Changes
49	Dunalley is a quiet, rural fishing town that is popular for visitors for these reasons. The noise of planes is extremely noticeable in such a quiet environment.  I live close to the highway but the planes are certainly much more noticeable than vehicles, due to the length of time they can be heard as they fly past. We were not previously overflow until September 2017 and our dreams of the quiet rural life are constantly undermined by how easily we are ignored with our concerns of the impact on our lifestyle choice.	Thank you for your feedback, your comments have been recorded as part of the PIR.	

### 2.9. Current operations

#	Comment	Airservices Response	PIR Report Changes
1	I find the many planes that fly over our house very off putting as some times they fly so low my windows rattle	The PIR identified that there have been more flights over Primrose Sands, Carlton and Carlton River than anticipated due to the increased use of the fixed visual approach and the increased uptake of Required Navigation Performance – Authorisation Required (RNP-AR) technology by aircraft operators. This trend is expected to continue as more aircraft become equipped with RNP-AR technology and aircraft operators increasingly focus on fuel burn and emissions reductions.  There are two recommended actions in the PIR report for further assessment of a flight path change suggestion that could potentially provide improved noise outcomes for residents in Primrose Sands and surrounds: moving the RWY30 RNP-AR flight path 2-3km to the east (Recommended Action 4), and a Noise Abatement Procedure change to specify preferred runway use at sensitive times of the day (Recommended Action 5).	
2	Flight path was moved directly over my house. Very noisy. Planes fly too low. Disruption to the serenity. Please have flights incoming over the water like they used to. There's no need to direct over residential areas		
4	Given the remote nature of Primrose Sands the noise level of the aircraft seemed quite high and out of place. It would be great to have a lower noise level and less frequent flights. Or even no flight path at all over Primrose Sands!		
5	The change to the flight path last time has planes flying low over Primrose Sands when approaching from the south. The noise is worse as they seem to change speed causing additional noise. Would prefer the approach up the river as this area is growing and the population is also increasing, a beachside holiday area should not have this additional noise.		



#	Comment	Airservices Response	PIR Report Changes
12	Why does the flight path go over houses creating noise pollution, perhaps it could go over unpopulated areas	These alternatives will now be subject to further design, safety and environmental assessments, and community and industry engagement prior to a decision on implementation being made. You will have the opportunity to comment on all proposed alternatives during this consultation.  Our Flight Paths Design Principles will be applied through this process.  It is important to note that being identified through the PIR as safe and feasible does not mean that the suggested alternative will be implemented – the outcomes of the environmental assessment and community engagement will be central to this decision making.	
18	From 15th December when Tasmanian borders reopen and flights increase 200 - 300% above current levels the effect on residents, particularly under the Smart Track, who experience these current negative impacts (i.e high dBA readings and drastic increase in usage) for 17 - 18 hours a day, will be further negatively impacted and their health will suffer.		
22	The findings prove that the flight path is too loud over our houses. Next week we will have 50 movements in and out of Hobart Airport. We work from home and are constantly disturbed. The flight needs to be moved to disturb less people, the findings show that! The planes are too low over our houses, our dog is scared every time they fly over.		
29	I am not happy with currant flight paths over our house on the Esplanade at Carlton River. The planes overhead are extremely loud. Too loud to stay ouside. We would be happy with the planes moving further over the river past Primrose Sands.		
10	Noise pollution is an issue recent decreases in noise due to less traffic has been noticed and is preferred.  Consideration of how opening up boarders and impacts on increased traffic and risk to community is of concern.	Thank you for your feedback, your comments have been recorded as part of the PIR.  Our role is to provide safe, secure, efficient and environmentally responsible services to the aviation industry and community. Decisions about flight schedules are made by airlines, airports and Commonwealth regulatory agencies.	
34	3. The flight path over Carlton Bluff is 1200 feet and surely must set off aircraft alarms.	Safety of aircraft operations is our highest priority with Australia's air traffic management among the safest in the world. The flight paths for Hobart Airport have been designed in accordance with the relevant Civil Aviation Safety	



#	Comment	Airservices Response	PIR Report Changes
		Authority and International Civil Aviation Organization safety requirements.	
47	Also, prior to the introduction of SIDS and STARS, flight routes were not as concentrated; now flightpath are one major highway in the sky. 45 flights per day now; as I write this I had two noise events between 22:00 and 22:30 which were clearly heard inside the house.	Thank you for your feedback, your comments have been recorded as part of the PIR.  Standard Instrument Departure (SID) and Standard Instrument Arrival (STAR) flight paths are designed to organise aircraft onto standardised paths and improves the safety of aircraft landing at and departing from an airport.	

### 2.10. Other comments

#	Comment	Airservices Response	PIR Report Changes
18	I believe it should be mentioned here that SECLA originally supported and represented the entire Tasman community but in the final submissions only represents the Dunalley community and does NOT represent Primrose Sands, Connelly's Marsh or my neighbours and I. AS needs to be aware of this fact.	Thank you for your feedback, your comments have been recorded as part of the PIR.	
18	On a personal note when clarifying the questions I have asked I request that I be supplied with a diagram that shows the location of my residence in regard to any smart track changes or in regard to BAVUW.	The PIR identified seven community and industry suggested flight path alternatives that will now be subject to further design, safety and environmental assessments, and community and industry engagement prior to a decision on implementation being made. This design and assessment activity will confirm the location of each suggested alternative and clear images and information will be shared with the community during engagement.	

#### OFFICIAL



#	Comment	Airservices Response	PIR Report Changes
34	The Flight Path over the Dunalley area was a much fairer path for the following reasons:-  1. The flight altitude was much higher over Dunalley and therefore much less intrusive than over Primrose Sands.  2. The population at Dunalley is much less and also sparser than PS. therefore the homes affected would have been minimal.	Thank you for your feedback, your comments have been recorded as part of the PIR.	
38	The SECLA is an incorporated body, formed in September 2017 in response to the unexpected introduction of SIDs and STARs at Hobart Airport.  Our purpose is 'to preserve and promote the peaceful coastal and rural amenity and brand of Dunalley, Murdunna, Boomer Bay, Marion Bay, Bream Creek, Kellevie, Copping and Connelly's Marsh', i.e. those communities which were affected by the Runway 30 STAR (we refer to these as 'Dunalley and surrounding communities' in our submission). Our activity has primarily been to collate and distribute information about flight path changes in these areas.	Thank you for your feedback, your comments have been recorded as part of the PIR.	



# 3. **DEFINITIONS**

Term	Definition
AEDT	Aviation Environmental Design Tool
ANO	Aircraft Noise Ombudsman
CASA	Civil Aviation Safety Authority
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999 (Cth)
FAA	US Federal Aviation Administration
ICAO	International Civil Aviation Organization
MNES	Matters of National Environmental Significance
NAPs	Noise Abatement Procedures
PIR	Post Implementation Review
SID	Standard Instrument Departure
STAR	Standard Instrument Arrival