21 July 2009

Nicholas Dowie
Department of Infrastructure

Via email Nicholas.dowie@infrastructure.gov.au

Dear Nicholas,

This letter is Hobart International Airport's response to the Safeguards for airports and the communities around them Discussion Paper. We thank you for the opportunity to provide input into this discussion.

Planning for compatible development

It may be recommended that an alternate noise forecasting tool should be a dBa forecasted contour at a rate of 50 dBa for residential development. Setting a maximum threshold of 50 dBa on all residential development will provide a standardised approach to all potential developments.

A good relationship with local council has ensured that a suitable planning scheme has been developed to address noise related issues in Hobart to date.

Hobart Airport does not have adequate feedback or information otherwise from the community to comment on community's aircraft noise expectation levels. A current lack of feedback would suggest that the standards are meeting community expectations. The positioning of Hobart Airport is favourable in terms of noise impacts and greatly minimises community implications, noise implications in conjunction with capacity growth is addressed in Hobart Airports current Master Plan and will seek public consultation.

As a principle, the referral of development within defined buffer zones is acceptable. It is suggested that all future residential development is referred to the Commonwealth Transport Minister or Secretary for approval. For Hobart Airport, strategic discussions and communications with local Government in the area of planning is critical to ensure compatible development is undertaken, this relationship currently exists.

Protection of operational airspace

Hobart Airport currently reports on all airspace regulatory provisions as required and it is recommended that regulatory provisions be strengthened and broadened to cover all CASA-Certified and Registered aerodromes.

A way in which planning rules may assist in protection of airports from unsafe airspace intrusions is by a referral system whereby developments are referred to Airports to work through the planning process and understand how a partnership approach can be developed to add value to all parties.

It is in the interest of safety that developments are discussed across state, territory and local planning schemes to ensure the needs of all parties are met and addressed, in terms of identifying a structural way of achieving this common planning requirements or assessment in this area may be required.

The only recommended change to combined planning rules would be the additional requirement to comply with OLS in planning laws and rules.

Turbulence and wind shear

The issue of wind shear is currently not a problem for Hobart Airport. If this was the case and became an issue into the future, it would be recommended that an industry standard for mechanical turbulence and wind shear be available. It is recommended that the standards should be prescriptive, however there is opportunity for challenges on a case be case assessment where requested or required.

In terms of expert modelling, it is suggested that this is a required inclusion for those developments that do provide turbulence and wind shear risk to the Airport and the cost should be bore by the developer.

Wildlife Hazards

Hobart Airport currently delivers a professionally managed bird and animal hazard management plan subject to an annual audit from CASA. The implementation of this plan provides management of bird and animal hazards on a practical level without setting a standard recommended zone.

Hobart Airport would recommend that an elliptical zone of 15 kilometres to either side of the runway, and 20-30 kilometres from runway ends due to aircraft approaches.

In relation to planning and consideration of wildlife hazards, Hobart Airport would recommend that all planning is mindful of environmental considerations and ensures that appropriate mitigation strategies are put in place where there is the likelihood or risk of attracting wildlife to development is prevalent. Issues including water bodies, plant types, farming and bird sanctuaries are all examples of appropriate environmental considerations in wildlife hazard management.

Wind turbines

Given that there are appropriate physical proximity guidelines in place for development, Hobart Airport would suggest that assuming that these proximity guidelines are met that the major outstanding issue for wind turbines would be

airspace and physical height. Issues including flight paths, OLS and noise contours should all be considered in wind turbine development.

There appears to be a current gap in the amount of knowledge and information available on aerodynamic impacts of wind turbines, more information may be required in this area to understand the implications of these types of developments.

If there is deemed to be aerodynamic impacts from erection of a windfarm, then obviously a report should be undertaken to determine what the potential impact could be prior to development.

It is recommended that wind farm developers are required to provide CASA with a report on potential aviation impacts in turbine development projects.

Technical facilities

Hobart Airport would recommend that any development of technical facilities in a restricted airport radius should require CASA assessment. The determined radius of impact should be determined upon a technical experts' recommendation and there should be a clear set of criteria developed for which a facility can be assessed against.

In relation to an expert assessment, planning requirements should be altered to ensure that any technical development that falls within the specified radius is considered in the planning process as per above.

Lighting and pilot distractions

Hobart Airport feels that the current CASA requirements are sufficient in the management of lighting and pilot distractions and that these requirements should be incorporated into local planning documents and guidelines.

Public safety zones and third party risks

Hobart Airport would not have a foreseeable impacted upon by the proposed runway public safety zones. The concern that Hobart would have is that in future development, the introduction of these zones eliminates large areas for runway development, and this would need to be balanced with the risks associated with not having the areas and the resultant outcomes.

An appropriate system of managing public safety zones is the US REPA and RESA Standards which work well and is easily understood. It would be suggested that a system such as this is implemented to all airports as a general rule, however a modified safety program is put in place for smaller non-RPT airports.

It would be important to not implement new standards retrospectively to allow further development of existing land that is not bringing significantly more people to the area. The most important control is to ensure that developments to do not attract mass gatherings of people into the proposed zones.

If you would require further information on our submission, please contact me directly to discuss.

Kind regards,

Brett Reiss
Chief Executive Officer
Hobart International Airport