



Tuesday, 17 March 2020

Mr. Ian Nelson
General Manager
Clarence City Council
Submitted Electronically

Dear Ian,

TASMANIAN PLANNING SCHEME EXHIBITION – CLARENCE DRAFT LOCAL PROVISION SCHEDULE

We refer to your correspondence dated 13 January 2020 in relation to the public exhibition of the Clarence draft Local Provisions Schedule and thank you for the opportunity to provide the following response after reviewing the relevant documentation.

We understand the importance of the Clarence Local Provision Schedule (LPS) and support the Clarence City Council in proper control of development in the Clarence community and welcome the inclusion of an airports code within the LPS to better safeguard the continued operation of the Hobart Airport.

In review of the LPS and associated documents, Hobart Airport (HBA) make the following comments of the content reviewed:

1. Within the Safeguarding of Airports Overlay Map presented
 - a. HBA is of the understanding that the 'Safeguarding of Airports' overlay will effectively replace the current 'Airport Buffer' overlay. The 'Safeguarding of Airports' overlay is comprised of 'Airport noise exposure area' and 'Airport obstacle limitation area'. We agree that these areas must be informed by data provided by HBA and we provide further commentary on this in the points made below. The Safeguarding of Airports overlay, however, must also ensure that all land previously covered by the 'Airport Buffer' is included within the overlay (ideally within the 'Airport noise exposure area'). Specifically, the entirety of Sandy Point must be included within the overlay to ensure that a sensitive development is not allowed in this location, as it would impinge upon airport operations. The potential issues with sensitive development proceeding in this area was the subject of previous discussion and represented in the Urgent Amendment CLA UA15-2016 document as precedence. On this basis, it should be maintained as part of the new noise exposure area and Hobart Airport will continue to oppose sensitive



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development in this area due to the unreasonable risk to continued airport operations.

- b. Flight path changes occur in response to changing aviation needs and at the discretion of Air Services Australia (ASA). This in turn influences noise contours and PANS OPS (Procedures for Air Navigation Services – Aircraft Operations Surface). The dynamic and changing nature of flight paths presents an issue when trying to capture this data as a static overlay for the life of a planning scheme. To respond to this, HBA proposes to provide Clarence City Council with updated noise contour and PANS OPS data following any changes to flight paths. HBA and Clarence City Council may then discuss whether an amendment to the Safeguarding Airports Overlay is required in response to the flight path change.
 - c. We note that the PANS OPS is not included in the Safeguarding Airports Overlay. We understand that the OLS (Obstacle Limitation Surface) is usually lower than the PANS OPS, but it is recommended that the two are compared and the lower of the two surfaces are included in the overlay to ensure that the correct assessment can be made.
 - d. The OLS provided in the overlay seems to have some slight discrepancies in it from our current version, potentially as a result of the runway extension completed in 2017. HBA wishes to provide Clarence City Council with current data for inclusion in the overlay.
 - e. We also note that it appears the N-Contours from the 2015 Hobart Airport Master Plan has been used to develop the overlay. Flight paths have been amended twice since the 2015 Master Plan, and this drawing is now obsolete. HBA wishes to provide Clarence City Council with current data for inclusion in the overlay.
 - f. We note that the N-Contours have been used in the overlay map as opposed to the ANEF that is referenced in the Australian Standard 2021:2015. We agree that the N-60 N-Contour is the preferred contour to be using in the overlay as it provides the best opportunity to assess actual potential noise as opposed to the ANEF.
2. Within the Significant Vegetation Overlay Map presented
 - a. The significant vegetation overlay for the Hobart Airport is incorrect in that it does not reflect values on the ground. Ecological assessment reports identify some of this area as Environmentally Significant Areas (ESAs), as required by the *Airports (Environment Protection) Regulations 1997*. The remainder of land area does not have significant vegetation present, although we acknowledge that state government databases may indicate a bioregional significance. The overlay should be representative of the values on the ground to align with the Hobart Airport Master Plan. HBA wishes to provide Clarence City Council with current data for the revision of this overlay.



3. Within the Potentially Contaminated Land Overlay Map presented
 - a. Nearly all of the airport site is marked as potentially contaminated apart from an area adjacent to Llanherne Drive. HBA has undertaken contaminated land assessments and are able to identify specific at-risk areas. HBA wishes to provide Clarence City Council with current data for the revision of this overlay.
4. Within the Road and Rail Assets Overlay Map presented
 - a. Greuber Road has been marked as an asset, yet this has not yet been formally handed over to Clarence City Council.

HBA understands that the key functionality of the Safeguarding Airports Overlay is to trigger the application of the Safeguarding Airports Code, which is a State Planning Provision within the Tasmanian Planning Scheme. While HBA understands that Clarence City Council cannot amend the SPP as part of the LPS drafting process, we wish to take this opportunity to note that there are a number of items in the SPP and Safeguarding of Airports Code that do not appropriately address the risks to airport operations from uncontrolled development as intended by the National Airports Safeguarding Framework. These are items that we intend to raise with the Tasmanian Planning Authority but, would welcome the opportunity to work with Clarence City Council directly in the meantime to address any potential issues.

Thank you for the opportunity to provide comment on the Clarence draft Local Provisions Schedule. Hobart Airport would again welcome the opportunity to work with Clarence City Council on any of the items raised in this submission and welcome the significant progress in developing a planning framework that considers the unique operational environment of the airport.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Luke Clasener'.

Luke Clasener

Airport Planner

