29 January 2021

SUNSHINE COAST POST IMPLEMENTATION REVIEW

REVIEW OF FEEDBACK - UPDATED DRAFT TOR V0.3

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FEEDBACK SUMMARY

Feedback period **– 11 December 2020 to 17 January 2021**

We received 180 submissions:

- **150 standard form submissions of one type (including two from community groups)**

- **48 standard form submissions of another type**

- **17 individual submissions**

- **9 community group submissions**

- **2 Council/elected representative submissions**

Number of Submissions
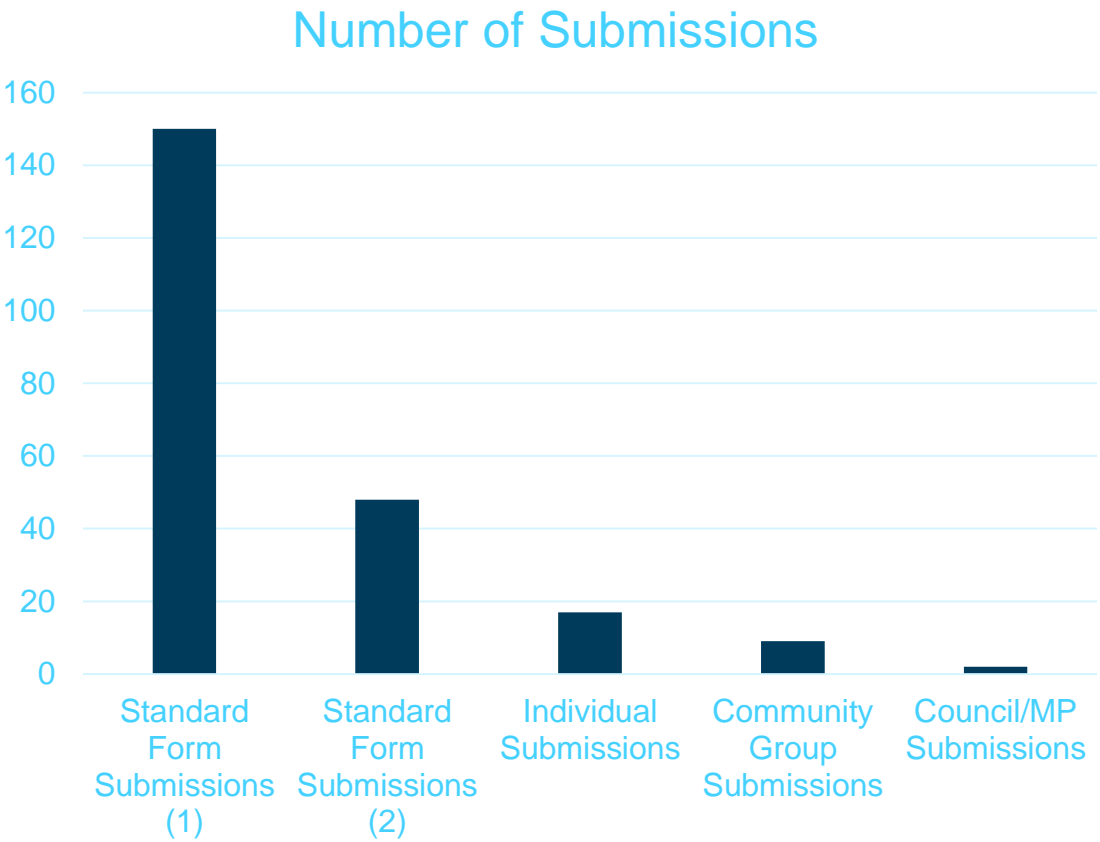
DRAFT PIR TOR FEEDBACK – TOR IN GENERAL

WHAT WAS THE FEEDBACK?

— A TOR should be as specific to a project as possible. Many facets of the PIR for the Sunshine Coast Airport will be unique and specific to the history and design. The PIR should reflect this uniqueness. Generic PIR overview statements do not provide strong direction and vision for the PIR process for which this TOR applies.

— The ToR v3 are silent on whether the PIR will be reviewing whether all the assumptions made in the TEIA were correct, or just a select few. TEIA assumptions included predictions about numbers of aircraft movements, aircraft fleet mix, influencing meteorological and seasonal factors, operational assumptions for flight paths and locations of N60/N70 noise contours.

— It's my view that the "Community" should be defined as part of the TOR. There should be regions specified or a km radius stated to define the extent of the "community" that is being considered and valued.

WHAT DID WE DO WITH IT?

— The PIR will follow Airservices standard PIR process and is not unique in its purpose or its technical focus. This includes investigation of community suggested alternatives. The unique element of this PIR will be the extent of community engagement and the oversight of the ANO. All other elements are part of our standard approach.

— Assumptions that were used for modelling of noise levels in the TEIA will be reviewed, particularly if a variance if found between modelled and actual.

— Anyone who is interested in this PIR is able to take part. We will not exclude any community member or geographic area.

DRAFT PIR TOR FEEDBACK – TOR IN GENERAL

WHAT WAS THE FEEDBACK?

— ToR v3 lacks a commitment to share information that ASA provides to industry and any feedback from industry with the community. This is not consistent with a transparent process as ASA has committed to deliver. ASA should fully commit to transparency of process.

— Conducting the PIR in two phases is counterintuitive to Airservices desire for various stakeholders to be understanding of each other's needs. Section 3.1 states the PIR will involve the consideration of both community and industry interests in any decision-making. How will Airservices balance the competing interests of stakeholders if no weighting is applied to the impacts?

— It is imperative that you won't be swapping one effected community with another, or opt to have longer than necessary flight paths which will vastly increase emissions.

WHAT DID WE DO WITH IT?

— We will share the findings of industry engagement, but will not share any commercially sensitive information, nor will we attribute findings to any particularly airline or operator. Our airline engagement is generally focused on their experience of flying the new procedures and flight paths to gain their feedback on any overly complex requirements or opportunities for improvement.

— Phase one is predominantly looking at operations since implementation of the changes under COVID conditions. Phase two is looking at operations once air traffic returns to representative levels. Community and industry engagement will occur across both phases. Aviation issues and consideration are complex and rarely lend themselves to a weighted assessment. Our reporting will demonstrate how these considerations have been assessed.

— Section 9 of the ToR states that "*we do not consider proposals that seek to move aircraft noise from one community to another as responsible*"

DRAFT PIR TOR FEEDBACK – TOR IN GENERAL

WHAT WAS THE FEEDBACK?

— At the bottom of page 6 of TOR V3 is seems that you plan for the TOR/PIR to have no constraint by the EIS. I strongly object to this proposal. Any investigation of a possible new flight path must adhere to any environmental constraints and regulations.

— Every new flight path proposal must go through a rigorous environmental study, as well as any effect on communities that might be disadvantaged by a change to the flight path.

— The priority needs to always be on achieving a sustainable long term outcome that is supported and embraced by the community – an outcome that respects the community and environment is a necessary constraint to ensure ongoing liveability and amenity that ultimately leads the Sunshine Coast to have the enviable lifestyle which is the backbone of our tourism sector.

WHAT DID WE DO WITH IT?

— That is correct. The ANO recommendation requested that the PIR not be constrained by the EIS. The EIS reference is interpreted to mean that any consideration of community suggested alternatives, as well as community engagement contributions, should not be viewed against the concept flight path corridors identified in the EIS, but as opportunities to create improvements unconstrained by the EIS concepts.

— Should a community suggested alternative be deemed feasible against the assessment process noted in the TOR, it will move into Airservices formal flight path change program, where our National Operating Standard for environmental assessment of flight path changes will apply. This includes assessment of social impacts.

— Achieving an outcome that is supported by the entire Sunshine Coast community could be problematic. Aircraft have to fly somewhere and at the end of the PIR some residents will continue to experience aircraft operations. Our aim is to ensure that the flight paths are located in the best possible location given the competing constraints.

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DRAFT PIR TOR FEEDBACK – 1. INTRODUCTION

WHAT WAS THE FEEDBACK?

— Question the removal of the word "engagement" and replaced with the word "information".

— Question the removal of the words "impact assessment" after environment and replaced with the words "(forecast noise impacts)".

— The bullet points need to reveal three new Objective headings covering; a) Project Management and Continuous Improvement, b) Community Impacts – social, health and wellbeing and c) Natural Environment Impacts.

WHAT DID WE DO WITH IT?

— Our standard PIR reviews community "information" (materials use to explain the change) not "engagement practice" (how we engaged). This change was made to confirm the focus based on comments received in review of the draft ToR. This change does not affect "engagement" on this PIR.

— Our standard PIR review modelled (forecast) noise impacts against actual noise levels. This change was made to confirm the focus based on comments received in the review of the draft ToR.

— Section 1 is introducing our standard PIR process. It is not appropriate to edit this section to add new headings. Continuous improvement is part of our PIR purpose and is noted in the second paragraph of section 1. We do not have a process for assessing impacts on Health and Wellbeing nor Natural Environmental Impacts during a PIR, nor are there accepted measures to objectively compare results to. This does not form part of our PIR.

DRAFT PIR TOR FEEDBACK – 4. OBJECTIVES

WHAT WAS THE FEEDBACK?

Objective 1 - *Review the forecast noise levels in the Airservices environmental impact statement (EIA) against actual aircraft movement data and noise levels post-implementation, and provide updated information to the community.*

— The above provision is inadequate. Current noise forecasts have been based on INM standards and not AEDT standards meaning that, without revised noise forecasts being conducted in accordance with AEDT recognised standards.

— Objective 1 is deemed to be met if noise is clearly explained and then, only if it is higher than expected, minimisation is considered. This is insufficient to resolve the problem of an unacceptable level of noise.

WHAT DID WE DO WITH IT?

— This is a requirement of our PIR.

   Where we have used INM modelling in the EIA, we undertake our review using AEDT as well as INM to identify any variances that may have resulted due to modelling methodology.

   This element of the PIR will identify if actual noise levels are higher than previous assessments. This information will be shared with the community.

— This objective is reviewing our noise modelling vs actual impact to take learnings on our modelling to improve our future EIA accuracy. Where actual noise levels are higher than expected, this is given further consideration in looking at operations or NAPs for example to understand if improvements should be made. This does not limit the review of opportunities to improve noise outcomes more broadly through objective 3.

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DRAFT PIR TOR FEEDBACK – 4. OBJECTIVES

WHAT WAS THE FEEDBACK?

Objective 2 - *Review the effectiveness of the Sunshine Coast Airport NAPs and identify any potential improvements*

— This objective is deemed to be met if the community understands their limitations, have an opportunity to comment and if opportunities to minimise noise through NAPs are identified. Again, this is insufficient. If there is demonstrable evidence of opportunities to minimise noise (e.g. by regulating noise where this is not currently done and imposing curfews), this should be a requirement for aircraft operators, not merely an 'opportunity'.

WHAT DID WE DO WITH IT?

— This objective relates specifically to the review of NAPs. These are an important tool in reducing noise impacts on the community, so present an opportunity for improvement of noise outcomes.

Airservices does not have the ability to change regulations or impose curfews, so this is not included in the PIR.

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DRAFT PIR TOR FEEDBACK – 4. OBJECTIVES

WHAT WAS THE FEEDBACK?

Objective 3 - *Identify opportunities to minimise the impact of aircraft operations on the community, including investigation of community suggested alternatives, and consider these against Airservices* *Flight Path Design Principles*

— This is a very positive objective, in so far as it goes to the heart of the problem of the flight path itself. However, the onus should not be on the community to find the solutions. The obvious solution is to have the flight path over the ocean. Alternatively, the noise impact could be reduced by using other runways. One way or another, the issue is not simply to make the community feel 'heard' but to solve the problem of noise. If remedies are within the jurisdiction of the Council or the Airport, in whole or in part, Airservices should work with them to find and implement those remedies.

WHAT DID WE DO WITH IT?

— The community does not need to present a highly developed or complex submission. A simple line on a map from A to B will suffice. The point of this process to ensure all ideas are considered and importantly, that Airservices responds to explain why these ideas do or don't work. Airservices will also consider our own ideas about how improvements can be made as part of the PIR and we will share these ideas with the community.

The location of flight paths is constrained by the orientation and availability of runways. Sunshine Coast Airport has one runway so it is not possible to use other runways.

Where a community suggested alternative requires engagement with Council or the Airport, we will include that as part of the review process.

DRAFT PIR TOR FEEDBACK – 4. OBJECTIVES

WHAT WAS THE FEEDBACK?

Objective 3 - *Identify opportunities to minimise the impact of aircraft operations on the community, including investigation of community suggested alternatives, and consider these against Airservices* *Flight Path Design Principles*

— Objective 5 is disingenuous in so far as a 'good' outcome is said to be that members of communities 'understand' why Airservices has made decisions that have had, and will continue to have, a profoundly negative impact on their homes and their communities. Residents have chosen to live in some of the most beautiful areas of the Sunshine Coast and hinterland, home to significant conservation initiatives and wildlife protection, as well as vibrant communities and businesses supporting tourism. And now these areas have an unacceptable level of noise day and night. We do not want 'understanding' but a solution.

WHAT DID WE DO WITH IT?

— We cannot guarantee to remove aircraft noise or even reduce it. As shown at the community meeting on 19 September 2020 the airspace around Sunshine Coast is very constrained. In this community meeting, one of the first statements made was that the one thing we can guarantee is that at the end of this PIR someone will have aircraft flying over them. As such, one of our aims to create understanding of why the flight paths are where they are and, if relevant, why they cannot be located elsewhere. Equally if we can provide improvements, we would seek to create understanding of why these improvements can be made.

DRAFT PIR TOR FEEDBACK – 4. OBJECTIVES

WHAT WAS THE FEEDBACK?

Objective 4 *Seek and consider feedback from industry: airport, airlines, general aviation operators and industry associations, to identify opportunities for potential improvement to operational and network efficiency and consider these against Airservices Flight Path Design Principles.*

— We support this provision provided an examination of expanding the controlled airspace is undertaken and the rationale for any evaluation leading to preferred outcomes is reported in detail.

WHAT DID WE DO WITH IT?

— Airservices designs airspace so that instrument flight procedures (landing and take off procedures for various aircraft types) and Standard Instrument Departures (SIDs)/Standard Instrument arrivals (STARs) (flight paths) are contained within controlled airspace.

Any flight path changes that require a change to controlled airspace to contain them, would be submitted to CASA as part of the Airspace Change Proposal process, and CASA is the final arbiter. We will report on the rationale for the ACP and on CASA's determination.

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DRAFT PIR TOR FEEDBACK – 4. OBJECTIVES

WHAT WAS THE FEEDBACK?

Objective 5 – *Engage genuinely with the community to provide opportunities to influence the outcomes of the PIR in accordance with Airservices Community Engagement Framework.*

— The Objective should identify fair and equitable decision making as a desired outcome and this outcome should be evidenced by the feedback from the engagement process.

— Evidence of the community's satisfaction that genuine opportunities to influence outcomes was afforded through the CEP should be sought and measured through feedback processes.

— The evidence proposed is that the Community Engagement Plan is accepted by the majority in the community, request for feedback on the engagement process is positive etc. What if this does not occur? What if the feedback on this upcoming engagement process is not positive?

WHAT DID WE DO WITH IT?

— Decision making for the PIR is unlikely to be able to be managed in a manner that is necessarily considered fair and equitable for the community, as there will be decisions that Airservices will have to make that may not suit the community. This will not be the result of an attempt to be disingenuous or to deceive the community, but will be due to our legislated function which has safety as our number one priority and the fact that we must comply with international and national standards in flight path design.

— Per Appendix A "Evidence" - we will seek feedback at the end of the PIR on the level of satisfaction with the engagement opportunities presented.

— Then we will not have met our objective. We need to explain the rationale for each action to create shared understanding of the process.

DRAFT PIR TOR FEEDBACK – 7. SCOPE

WHAT WAS THE FEEDBACK?

— In section 7.1 PIR Scope you refer to: "Airspace: Expanded to the north and adjusted to the south to contain the new instrument flight procedures (see figure 1)........." There is NO figure 1, and I couldn't see what you mean by "Expanded to the north...", So How do You Expect Me to Comment on this?

— I request that training flights, joy flights etc that are operating from the Sunshine Coast Airport are also included in the Terms of Reference.

— The ToR v3 is unclear about how the four phases fit together, how they interrelate and why certain activities (such as the review of NAPs) appear in more than one phase. It is also unclear what information will be shared from each of the phases and between which parties.

WHAT DID WE DO WITH IT?

— You are correct that we referenced a figure and did not provide this in the TOR. Apologies for this oversight. We are currently preparing documentation that will contain these images for release to the community, including explanation of what they show and their relevance. It was deemed more informative to provide this information in a more detailed manner as part of our PIR information materials than trying to explain it in the TOR.

— We will provide information on aircraft operations as part of the PIR, but note our ability to fully identify the nature of all flights outside our controlled area is limited. We will provide the best information we have available.

— There are two phases in this PIR. The ToR provides information on Airservices broader PIR program post implementation of a change which includes safety and operations PIR activity. This is not related to this PIR and generally reviews if the new flight paths can be flown and operated safety and if there are any unnecessary complexities in the operations.

DRAFT PIR TOR FEEDBACK – 8. PRINCIPLES

WHAT WAS THE FEEDBACK?

— Section 8 Principles mentions that safety is the most important priority and cannot be compromised. I would suggest that the overwhelming majority of people would agree with that statement, however there is no discussion about the degree of change to safety. Will any changes that result in a negligible change to the detriment of safety, yet a large gain for the industry and community be considered for implementation?

WHAT DID WE DO WITH IT?

— Safety cannot and will not be compromised. This does not mean we will not consider proposed changes, but they must be safe to proceed.

DRAFT PIR TOR FEEDBACK – 9. SUGGESTED ALTERNATIVES

WHAT WAS THE FEEDBACK?

— The Terms of Reference state that "future residential areas" should be considered in assessing alternate flight paths. I request that this consideration is dropped from the ToR. Potential future rights of potential future purchasers who have every opportunity to be fully aware of existing flight paths and associated noise and their impact on property prices can not be compared to the rights of existing residents who are newly overflown, were not fully informed and believed they would not be impacted by the flight path changes when they were first imposed.

— Airservices needs to include a sentence recognising that community suggested alternatives held by them prior to CASA approval, and as committed by Airservices, will also be considered in the PIR process (ANO 4/2020, p.30).

— Details of the 'Increased track miles for industry (impacting emissions, operation costs)'? As part of transparency this needs to be provided.

WHAT DID WE DO WITH IT?

— The reference in Section 9 is to our standard process for considering community suggested alternatives. This is just one of many considerations and should not be read as a sole determining factor.

— Section 7.1.1 of the TOR states:

"*Consideration of community-suggested noise alternatives submitted during the pre-implementation engagement period (2019) and during this PIR (responding to recommendation 2a in the ANO report)*"

— This will be included in reporting.

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DRAFT PIR TOR FEEDBACK – 9. SUGGESTED ALTERNATIVES

WHAT WAS THE FEEDBACK?

— The ToR indicates that the assessment of any alternate flight path proposal will involve the range of factors outlined on p12. However, for the current flight paths the only environmental impact to be considered is noise. As there were no or inadequate assessments of the environmental impacts of the current flight paths, unless ASA has access to other environmental impact information for the area, it is hard to understand how this assessment and comparison could be made. If ASA does have such information it should be provided to the community and other stakeholders.

— We question how the criteria for consideration of alternatives are weighted considering the vast differences in all the communities affected by this TOR. We need a methodology that does not disadvantage low-density communities in very low ambient noise environments by comparison with others. Many noise-affected communities have awareness of airport noise related issues via property zoning both past and present through local council information, which has been available to the public for some time.

WHAT DID WE DO WITH IT?

— The process provided is our standard process for assessing community suggested alternatives.

The TEIA and before that the EIS contain environmental assessment information (including environmental impacts outside of noise) relevant to the change before it was implemented.

— There is no weighting of these considerations (other than safety and operational complexity) and we seek in our reporting to explain how all matters were given due consideration. As noted it the ToR, we do not see shifting noise impacts from one community to another as an environmentally responsible outcome.

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WHAT WAS THE FEEDBACK?

— To offer the opportunity for contributions from the community is sensible and supported as a general engagement protocol. However, in the case of specifying alternative flight paths, the affected communities should simply be asked to indicate in a schematic indicative manner on a 2D map where they would prefer to see flight paths and provide a simple rationale for same.

— To allow two to three months for affected community members to develop such proposals also seems out of step with the timeframe allocated for other significant stages in the runway/flight approvals and now in the PIR.

— The ToRv3 make clear that only noise will be considered in assessing the environmental impacts of the current imposed flight paths but that the assessment of environmental impacts for any proposed alternate flight path(s) will include inputs based on a range of other factors including, as an example, increased emissions where aircraft may have to fly greater distances. There is a clear inconsistency in assessment and evaluation criteria, for which no rationale has been provided.

WHAT DID WE DO WITH IT?

— A schematic is all we expect, with a some accompanying narrative to explain the thinking. A pencil line from point to point will suffice.

— The timeframe has been identified to enable sufficient discussion and consideration within the community. I am not sure if "out of step" means too long or too short, but we are happy to discuss this further to reach an appropriate timing.

— The assessment conducted in the PIR is to enable comparison of the modelling EIA noise levels against actual noise levels to identify any variance and possible reasons for this. This is part of a continuous improvement process and also assists in identifying where noise improvements may be required. The assessment of alternatives has to consider a range of factors to ensure the change that is being proposed is environmentally responsible – ie not just shifting impacts from one community to another.

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DRAFT PIR TOR FEEDBACK – 9. SUGGESTED ALTERNATIVES

WHAT WAS THE FEEDBACK?

— ASA should clarify what baselines it has at its disposal, or present the community with information against which it intends to assess any community suggested alternatives, where no baselines or previous assessment outcomes exist.

— Section 8 of the TOR for the PIR states a principle includes – where considering noise impacts, the "degree of change" will be considered, as well as the "number of people affected". Clarification on how the degree of change can be assessed if no ambient noise measures were taken prior to these communities being overflown.

— I do not have great confidence in the willingness to assess and accept community identified alternative paths as Airservices staff stated during the community meeting held on the 19 September 2020 "*Airservices won't start from scratch as it's too lengthy and timely*". This is not a limitation that was advised by the ANO, nor was it considered in Airservices' acceptance of the ANO's recommendations.

— Cost and timeliness are not considered negative factors in assessing an alternative for feasibility.

WHAT DID WE DO WITH IT?

— The TEIA is the baseline for modelled versus actual assessment. Current noise profiles and mapping of sensitive locations would form part of the assessment of alternatives. The actual assessment of alternatives will be conducted per the criteria in the ToR.

— This was requested during the review of the draft TOR in October 2020. It was in reference to community suggested noise improvements and the request that we not just consider the number of people affected by noise but any change they might experience from the current situation.

— The ANO recommendation was not to redesign the flight paths but to consider community suggested alternatives. This is exactly what the TOR provides for.

— Cost and timeliness are a very real consideration and cannot be omitted. The benefit provided will need to at least match the cost and effort involved in the change.

WHAT WAS THE FEEDBACK?

— The ToR needs to be clearer about what will happen if a community suggested alternative is to be recommended for implementation. Will community engagement be undertaken with (potentially) newly affected areas as part of the PIR process or will a separate change process be undertaken that will engage with those parts of the community that will potentially be affected by such change?

— This section does not provide any information about how competing priorities will be assessed. There needs to be an overall "net benefit" from the proposed change compared to the current flight paths i.e. the proposed alternative will provide an overall "net benefit" compared to the existing flight paths if a change is implemented. That is not made clear in the current process to assess the community suggested alternatives.

WHAT DID WE DO WITH IT?

— The TOR notes our NOS will apply to this assessment. This includes EIA and Community engagement. **Have added clarification in the TOR.**

— We apply a "balanced approach" to considering these alternatives. The concept of "net benefit" will change depending on the stakeholder so is problematic to gain an agreed position on.

We note receipt of some early submissions for these alternatives. The have been recorded for future consideration.

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DRAFT PIR TOR FEEDBACK – OPERATIONS

WHAT WAS THE FEEDBACK?

— You need to address all of the impacts that have resulted from the changes to airspace and flight paths.

— There is a discrepancy between the planned flights proposed and the current flights endured. The flight paths are not being adhered to, there are numerous aviation companies flying outside the 'rules' and there is massive unexpected disruption.

— It is hard to comprehend that ASA and ATC have no jurisdiction within and outside Air Traffic Control hours over their own air space and that this means that aircraft do not have to adhere to the published Flight Paths – surely a published flight path is the safest and most expeditious route to the airport and should be followed regardless of the time of day.

WHAT DID WE DO WITH IT?

— All changes implemented by Airservices will be reviewed by the PIR, this includes identifying any resulting affects to other operations that Airservices may or may not control. Where we do not control an operation we cannot commit to changes as a result of the PIR, but we will work with the community on a case by case basis to determine what is and is not possible.

— We will review the operation of the flight paths and will work with airlines and operators to understand where deviations from published procedures exist. **Note:** aircraft operating under Visual Flight Rules (for example General Aviation aircraft) are not required to follow the Instrument Flight Rules procedures that Airservices implemented.

— We will provide more detail on how airspace is managed during the PIR.

DRAFT PIR TOR FEEDBACK – OPERATIONS

WHAT WAS THE FEEDBACK?

— Many homes are situated up to 1000ft above sea level creating a major impact from all types of aircraft, as well as light and commercial 'joy flying' overhead – under 500ft.

— Alliance Airlines are frequently flying over the Hinterland – I request a full investigation into the noise and environmental impacts of these older and noisier aircraft – this needs to be included in the PIR. So far we have not seen any mention of Alliance Aircraft. Why are they exempt when they are creating so much of the noise pollution?

— I am very concerned about the significant future impacts in our region given the airport is currently operating at very low use levels due to COVID. The PIR therefore must consider accurate data for noise and environmental impacts now from the actual aircraft and routes being flown and then project/ model those impacts for the higher use that's expected to come. I am seeking to future proof our region from the higher aircraft traffic.

WHAT DID WE DO WITH IT?

— We will seek to identify operations affecting this location as part of the PIR, but note our ability to fully identify the nature of all flights outside our controlled area is limited. We will provide the best information we have available.

— We have not mentioned any specific airlines in the PIR ToR as it is not standard practice to call out any particular operator. The PIR will review aircraft operations and provide further information on this.

— Noise modelling can provide information on current noise levels based on actual aircraft movement. This can be used to some degree for future projections, however the impacts of COVID-19 to the type of aircraft being flown and their origin and destination would need to be compared to future flight volumes, which at this time are difficult to project into the future.

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DRAFT PIR TOR FEEDBACK – OPERATIONS

WHAT WAS THE FEEDBACK?

— The outcome of identifying operational and network efficiencies will be apparent from Airservices providing complete data covering the flight paths. Currently there is no operational or network efficiency in taking flights north of the airport as U turns. There is a cost to Industry which needs to be revealed.

— We are experiencing many aircraft flying over our community north of the defined flight path with some instances of completely random aircraft activity. We have been measuring aircraft activity daily recording height, time and noise levels. We now realise that once again ASA has lost control of aircraft activity over our community having no ability whatsoever to comply with agreed terms and conditions flowing from the current operational implementation. Serious breaches of noise and height conditions promised by ASA have now occurred.

WHAT DID WE DO WITH IT?

— Further information on operations and considerations during take off and landing will be provided during the PIR.

— Airservices does not have a compliance or regulatory function and cannot compel aircraft to follow a particular procedure. As part of the PIR we will review the operation of the flight paths and the application of the NAPs and will work with airlines and operators to understand where deviations from published procedures exist and any possible improvements needed. **Note:** aircraft operating under Visual Flight Rules (for example General Aviation aircraft) are not required to follow the Instrument Flight Rules procedures that Airservices implemented.

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DRAFT PIR TOR FEEDBACK – OPERATIONS

WHAT WAS THE FEEDBACK?

— We were told at a meeting in 2019 at the Coolum Civic centre by the powers to be that flights over the general area would be at 4,500 feet and that there would be a maximum of 13 a day. We now find that this was not the case, these jets fly in at 1,984 feet and apparently when the COVID disaster finalises flights will increase too 30 a day and by 2035, 60 a day.

— At present there are approx 3 to 4 a day directly over us and more to the south east. These are so noise extreme that conversation is not possible. These planes required to be stopped now from flying over here.

— Flights overhead significantly exceed what we expected from the material that was originally provided.

WHAT DID WE DO WITH IT?

— We will provide information on current aircraft movements and noise levels as part of the PIR.

— We have no authority to cease aircraft operating. We can consider alternatives to improve noise outcomes for the community.

— Review of our information materials explaining noise impacts will be part of the PIR and we will be seeking feedback from the community on these tools.

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DRAFT PIR TOR FEEDBACK – OPERATIONS

WHAT WAS THE FEEDBACK?

— I struggle to understand why ALL flights cannot arrive from the south east...ie over the ocean, plus depart to the south east, when using the new runway. The days of aircraft necessarily landing or departing into a head-wind are surely outdated? We've come a long way since the Wright brothers. The odd occasion of extreme weather could possibly be factored. Brisbane airport seems to function with its runway orientation.

— Recently approved flight paths for Runway 13 departures do not comply with Airservices own Flight Path Design Principles noise exposure assessment framework.

— The TOR should include provisions to examine proposals for improving aircraft compliance with flight paths.

WHAT DID WE DO WITH IT?

— Aircraft take off and land into the wind. This is the case at airports across Australia, including Brisbane Airport. Runways are usually oriented to best suit the local meteorological conditions.

CASA regulations prohibit ATC from nominating a runway for use if the downwind is greater than 5 knots on a dry runway.

We will provide information on aircraft operations as part of the PIR.

— The Flight Path Design Principles (FPDP) were adopted in October 2020 after completion of the Sunshine Coast Flight Paths. They did not exist at the time of development of these flight paths and cannot be applied retrospectively. Any consideration of alternatives as part of this PIR will apply the FPDPs.

— Airservices does not have a compliance or regulatory function and cannot compel aircraft to follow a particular procedure. As part of the PIR we will review the operation of the flight paths and the application of the NAPs and will work with airlines and operators to understand where improvements can be made. **Note:** aircraft operating under Visual Flight Rules (for example General Aviation aircraft) are not required to follow the Instrument Flight Rules procedures that Airservices implemented.

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DRAFT PIR TOR FEEDBACK – OPERATIONS

WHAT WAS THE FEEDBACK?

— The community seeks to understand how flights are managed when the SCA ATC tower is closed and whether there are opportunities for noise improvements in the area of ATC operations. Information on whether Brisbane ATC gives some coverage (either via radar or direct instruction) to MCY operations is required.

— The EIS and 2019 community consultation, both promoted that there would be no late-night flights until 2040 and at that time there would only be two flights occurring

— There is no comment as to the 'Operational Implementation' PIR being provided for Community feedback. It is assumed that document contains the '…related procedures and documentation' that would be equally relevant to the parties being communicated within the PIR ToR. Is this correct?

WHAT DID WE DO WITH IT?

— Outside tower hours, Airservices provides an Flight Information Service in Glass G (uncontrolled) airspace. We will review/provide information on operations outside tower hours as part of the PIR.

— This information has not been able to be located in the 2014 EIS. Our TEIA in Section 5.4 states the "vast majority of jet aircraft movements were not night movements" and that " a total of 30 jet aircraft movements across the 2017/2017 data were night movements, amounting to ….about 0.3%". Thus night movements were considered to be part of the operation of the airport, but due to volume were not considered significant from an assessment perspective.

— The operational PIR is a review with ATC and airlines on the flight paths. This generally reviews if the new flight paths can be flown and operated safety and if there are any unnecessary complexities in the operations. If there is particular documentation the community would find useful, we will do our best to provide it unless protected by commercial in confidence or similar. This is not related to this PIR and will not be provided for community feedback.

DRAFT PIR TOR FEEDBACK – OPERATIONS

WHAT WAS THE FEEDBACK?

— ASA claim they have no control over GA aircraft who have become a constant nuisance in the Hinterland since the introduction of the new flight paths and VFR traffic is "out of the scope" of the PIR (para7.3) – so then who does have the jurisdiction to control these craft whilst in the air – we would ask the PIR review who is ultimately responsible for the impact and nuisance that these aircraft are causing over homes and ensure that someone takes responsibility for this - surely ASA can enforce the Rules of the Air and encourage pilots to Fly Neighbourly – we would like the PIR to investigate this further – a point to note here is that with the closure of the second Runway this has much increased needlessly the GA/VFR and other traffic which could have used the existing Runway

WHAT WAS THE FEEDBACK

— Further information on Airservices responsibilities and that of others will be provided through the PIR.

Airservices is a service provider not a regulator. We do not have enforcement powers.

Fly Neighbourly Agreements are voluntary agreements between airports and aircraft operators.

DRAFT PIR TOR FEEDBACK – NOISE MODELLING/MONITORING

WHAT WAS THE FEEDBACK?

— Request noise monitoring be commenced immediately in the Hinterland as we are already heavily impacted. At the WebEx meeting with ASA it was stated that a Stable Traffic Pattern will have to be established before commencing Noise Monitoring – this is unrealistic and unfair.

— I request confirmation of the noise monitoring 'areas' proposed to be monitored in the Hinterland. The Hinterland typically has an ambient noise level as low as 25dB. Therefore we should not be removed from the monitoring area because we are not in the N60 and above noise corridor – it was stated at the WebEx meeting that Noise Monitoring will only occur in those N60 and above contours.

WHAT DID WE DO WITH IT?

— Noise monitoring is conducted in a PIR to enable comparison of actual impacts with modelled EIA impacts to determine if our EIA assumptions were correct. The primary purpose of this is to take learnings for future changes, however we also use the monitoring results to provide information on actual impacts to the community. Aircraft operations need to be at a level that will enable representative comparison against the volume used in EIA modelling. In the interim, and as discussed at the 8 December 2020 meeting, we can model the current noise levels using actual flight data (location, height and type of aircraft) to share noise levels with the community.

— As noted in the TOR Section 7.1.2 "potential noise monitoring locations will be identified in consultation with the community". We will prepare a noise monitoring feasibility assessment to identify the "zones" in which we need to place noise monitors. These zones need to be in positions in close proximity to the flight path we are reviewing, the locations used for modelled noise levels in the EIA, and areas with populations as well as structures which may accommodate a noise monitor installations. Other factors, including proximity to other noise sources (highways etc) are also considered.

DRAFT PIR TOR FEEDBACK – NOISE MODELLING/MONITORING

WHAT WAS THE FEEDBACK?

— Everywhere under the new flight paths should be entitled to noise monitoring (regardless of original noise modelling) to establish ambient noise and actual noise disturbance – the fly throughs were inaccurate as are the predicted number of flights.

— I would like to see that ASA research prevailing ambient noise levels as part of the investigation for any new flight path you might propose. It is obvious that areas with low baseline ambient noise levels stand to be affected more adversely by any noise coming from low flights over head than areas with a higher baseline ambient noise.

WHAT DID WE DO WITH IT?

— We are limited in the number of temporary noise monitors we have access to, due to implementing similar reviews at other locations across the country, and the purpose of noise monitoring is not to provide a noise reading at every location.

We will prepare a noise monitoring feasibility assessment to identify the "zones" in which we need to place noise monitors. These zones need to be in positions in close proximity to the flightpath we are reviewing, the locations used for modelled noise levels in the EIA, and areas with populations as well as structures which may accommodate a noise monitor installations. Other factors, including proximity to other noise sources (highways etc) are also considered.

— Our environmental assessment includes evaluation of rural or urban residential areas and application of different environmental assessment criteria. For example, a base assumption is made that ambient noise levels are lower in rural residential areas and therefore the noise impact assessment thresholds are set lower as appropriate (e.g. less aircraft movements will trigger significance criteria in rural residential areas than for urban residential locations).

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DRAFT PIR TOR FEEDBACK – NOISE MODELLING/MONITORING

WHAT WAS THE FEEDBACK?

— In response to the feedback of 'The PIR must be undertaken as if no changes have been implemented', Airservices state ' The PIR will assess the changes made to the pre-existing situation'. (Community Meeting 8/12/2020. Point 7, p.11). Therefore the data from prior to the 2014 EIS and Airservices TEIA of 2019 are the baseline measures to be applied to Communities and Environments. That means ambient noise levels are baselines.

— Noise models for night-time flights must be included.

— Use real data currently collected by the community to understand the real negative impact of the new runway, now operational.

— The existing TOR does not require that methods and assumption used in making any adjustments for COVID19 downturn be clearly documented, justified and communicated.

WHAT DID WE DO WITH IT?

— The scope of the PIR is to review the actual impacts of the changes that have been made and compare them to the forecast impacts in the TEIA. Review of the 2014 EIS is not within the scope of this PIR. **Clarifying point included in ToR.**

— We will provide this information based on actual aircraft operations.

— We are happy to receive any information from the community to support the PIR.

— Any assumptions or adjustments made to consider the impacts of COVID-19 on aircraft movement will be communicated to the community as part of the PIR.

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DRAFT PIR TOR FEEDBACK – NOISE MODELLING/MONITORING

WHAT WAS THE FEEDBACK?

— I want to request that a noise monitor is put on my property to get the actual noise levels, not just made up ones.

— ASA proposes to undertake noise modelling in Phase 1 rather than noise monitoring and to do so using different tools than used in the EIS. Neither action appears useful. It does not address Objective 1 which is to assess forecast noise against actual noise. Which forecast will be used to compare against actual? In our view it should be compared with the forecast that was in the public domain rather than further modelling.

— A trigger-point for determining when operations have stabilised is not defined in this provision.

WHAT DID WE DO WITH IT?

— As noted in the TOR Section 7.1.2 "potential noise monitoring locations will be identified in consultation with the community". We will prepare a noise monitoring feasibility assessment to identify the "zones" in which we need to place noise monitors and undertake an EOI process with the community to suggest suitable locations.

— The noise modelling in phase one will be completed to provide information to the community on current operations and impacts. The noise monitoring in phase two will be used to assess forecast noise from the EIA against actual noise experienced. This is why we need to wait until we have a representative number of aircraft flying.

— There is no defined trigger point for this. It will be a consideration based on the number, mix of aircraft and ports of operation. **Have added clarification in the TOR.**

DRAFT PIR TOR FEEDBACK – NOISE MODELLING/MONITORING

WHAT WAS THE FEEDBACK?

— Noise assessments of current flight paths have been based on INM standards and not AEDT standards meaning that noise impacts at affected communities may be much higher than those depicted in Airservices previous assessments. Accordingly, the measures adopted for minimising noise impacts will be most certainly be inadequate. This deficiency must be redressed through the PIR with a requirement for reassessment and redesign of flight paths in the TOR.

— Noise monitoring should be conducted by qualified acoustic consultants

WHAT DID WE DO WITH IT?

— Noise modelling and monitoring during the PIR will identify any deficiencies in the earlier TEIA modelling. The PIR will identify if there is any opportunity to improve noise minimising measures, such as NAPs. The PIR does not include within its scope the redesign the existing flight paths.

— Airservices PIR team includes a qualified Acoustic Engineer who is a Chartered member of the Institute of Engineers Australia (MIEAust CPENG) in the area of Environmental Engineering; registered on the National Engineering Register (NER) and with the Board of Professional Engineers of Queensland (BPEQ); member of the Australian Acoustic Society (MAAS).

 As noted previously we will not be engaging consultants to conduct the PIR.

DRAFT PIR TOR FEEDBACK – NOISE MODELLING/MONITORING

WHAT WAS THE FEEDBACK?

— There exists a wonderful opportunity for baseline noise monitoring to be carried out in the absence of aircraft movements, especially in newly affected communities. This work should be commissioned immediately to ensure a true depiction of background levels in the absence of new noise sources. This data can also be used in the future to provide understanding of future noise impacts and to provide an insight into the ongoing reductions in acoustic amenity over time as future operations increase in the future

— Commission an assessment to evaluate the likely cumulative noise impacts on the newly affected communities with a view to determining the degree of degradation in liveability and well being and the potential increase in stress and related health implications over the foreseeable future.

WHAT DID WE DO WITH IT?

— Airservices does not conduct baseline/ambient noise monitoring as part of the flight path design process. This is not a requirement under our Standards and Procedures.

— Our PIR noise modelling and monitoring can provide information on all aircraft operations (where data is available) to provide a current cumulative assessment. The EIA used the 4% annual growth rate to estimate 2040 traffic, which was based on pre-COVID assumptions. As our industry has changed due to COVID, it is likely the 4% is no longer appropriate, however we have no data to suggest a more accurate growth rate at this time.

DRAFT PIR TOR FEEDBACK – NOISE MODELLING/MONITORING

WHAT WAS THE FEEDBACK?

— The N70/N60 contours do provide some insight into the likely exposure but these are predictive assessment tools and prone to error at larger distances from the airport. Without an understanding of the existing background noise environment in those communities, one cannot gain an insight into the degree of change and therefore impact likely to be experienced. The N70/N60 contours are best used as land-use planning tools for town planners to utilise in assessing infill and greenfield development activity across various land use types.

— It is heartening to learn that the community will have input into where the noise monitors are located, however there is no mention of how many monitors will be in place nor for how long.

WHAT DID WE DO WITH IT?

— The N60 and N70 contours are used to identify areas that are predicted to experience levels of noise that trigger referral under the EPBC Act, depending on the volume of flights per day and the nature of the area (rural or urban). The PIR compares these projected areas of noise impact to the actual areas being impacted to determine if the assessment was correct and if there are reasons for any variances.

— The noise monitoring feasibility study will identify this.

DRAFT PIR TOR FEEDBACK – ENVIRONMENTAL ASSESSMENT

WHAT WAS THE FEEDBACK?

— Criteria for Triggering a Formal Environmental Assessment – the new SCA Runway meets many of these Criteria – the PIR needs to address these or answer why they as a Group 1 Member of the International Civil Aviation Organization (ICAO) the ICAO "Guidance on Environmental Assessment of Proposed Air Traffic Management Operational Changes" have not followed this guideline as this is industry best practice.

— According to the ICAO Guidance on Environmental Assessment of Proposed Air Traffic Management Operational Changes – The scope of the environmental assessment may cover a known geographical areas for anticipated local impacts. Typically surveys of the area of potential impact would be conducted to identify important assets and sites that are relevant to the impacts being assessed including, but not limited, to: • population distribution; • tranquil areas; • schools and hospitals; • touristic or leisure areas; • areas of special ecological or historical value; and • coastal zones.

OUR RESPONSE

— The EIS conducted in 2014 triggered referral under EPBC Act criteria. The later TEIA also identified areas that exceeded referral criteria. The trigger areas were reviewed and considered to be covered in the previous referral. Re-referral was not required.

— Our flight path change process includes an initial noticeability and sensitivity screening and social impact hotspot identification that identifies the locations noted (schools, aged care, tourism locations etc). We use this information as part of flight path design considerations and to make direct contact with those locations or the peak bodies that represent them (Councils and tourism groups) to advise of planned changes and seek their involvement in engagement activities. This assessment does not mean we will not place a flight path in these locations, but we will seek to avoid them as much as possible.

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DRAFT PIR TOR FEEDBACK – ENVIRONMENTAL ASSESSMENT

WHAT WAS THE FEEDBACK?

— The aircraft used for the Noise Modelling are not the ones which are actually currently flying – the PIR must include the actual aircraft types and the actual noise not modelling.

— The impact on the communities north of the airport cannot be understated. We have a low ambient noise environment and the increased and noisy commercial and general flight traffic has significantly diminished this environmental amenity.

— The noise levels of N60 and N70 are way too high for the hinterland regions where ambient noise is around 30dB(A). Lower noise level contour studies are necessary to truly prove the current noise impact and enable the effectiveness and confirmation of any changes.

WHAT DID WE DO WITH IT?

— For the purpose of comparing actual against modelled noise levels, we need to use the same aircraft type as described in the EIA. All aircraft using the flight paths implemented will be included in the review more broadly however. COVID-19 has affected the use of some aircraft types.

— Our environmental assessment includes evaluation of rural or urban residential areas and application of different environmental assessment criteria for each. For example, a base assumption is made that ambient noise levels are lower in rural residential areas and therefore the noise impact assessment thresholds are set lower as appropriate (e.g. less aircraft movements will trigger significance criteria in rural residential areas than for urban residential locations).

— N60 and N70 contours were modelled in the EIA in accordance with our Standards. The review will use these contours to enable comparison of modelled EIA versus actual noise levels. We will provide information on noise levels outside of these contours where available.

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DRAFT PIR TOR FEEDBACK – ENVIRONMENTAL ASSESSMENT

WHAT WAS THE FEEDBACK?

— Surely Airservices is responsible for assessing post-implementation the impact on the environments that were assessed prior to implementation.

— What investigation has Airservices undertaken to ensure the Local Government (Sunshine Coast Council) completed the tank water quality assessments prior to and following agreement of the flight paths? Airservices cannot dismiss the issue by diverting it to SCC. There is no evidence of where and how many water quality tests of households, lakes and dams were completed prior to and post-implementation. Airservices agreed the flight paths and therefore have a responsibility to ensure the Local Government has acted and will provide results at the various locations under/adjoining the new flight paths.

— It is our understanding that ASA will use the current (TEIA) aircraft noise predictions as their Baseline for assessing the appropriateness for changing any flight paths.

WHAT DID WE DO WITH IT?

— The PIR will compare actual noise impacts to projected impacts to assess if the projections were correct and if any action can be taken to reduce impacts. It will also consider suggested improvements from the community.

— Airservices has no regulatory or enforcement function that would enable us to compel any local government (or other body) to complete any action.

— The TEIA will be used as the baseline to assess our modelling of the environmental impacts. Actual noise levels will be compared to modelled noise levels to determine if our assumptions and projections were correct or if we need to take and learnings from this. The criteria for consideration of suggested alternatives is provide in the ToR.

DRAFT PIR TOR FEEDBACK – ENVIRONMENTAL ASSESSMENT

WHAT WAS THE FEEDBACK?

— The figures provided on the likely number of aircraft using the new flight paths (including projections up until 2040) were significantly lower than the actual numbers of aircraft using the new flight paths. This seems to be because military aircraft, smaller planes and helicopters were not included in the numbers.

— Surely Airservices knew, or ought to have known, when designing flight paths over residential areas, that airport hours of operation would be of critical importance. Whether airport hours of operation are outside its legislative authority, Airservices bears some responsibility for negotiating solutions that make its own decisions acceptable to affected communities.

— A comment should be included of differences in terrain, such as crossing from the Ocean, a narrow strip of land and then Lake Weyba as a base assumption of noise levels (Q&A v1.0 2.2, p.7). What are the noise level differences between water and land crossings?

WHAT DID WE DO WITH IT?

— The numbers provided were limited to just those using the new instrument flight procedures. We are reviewing how we should present this information moving forward and will request feedback from the community during this PIR.

— Airservices remit does not cover airport hours of operation. Our EIA does consider future airport schedules and expected industry growth when modelling noise impacts and our TEIA (Section 5.4) noted expected night time use of the airport.

— We will seek to provide this information during the PIR.

DRAFT PIR TOR FEEDBACK – ENVIRONMENTAL ASSESSMENT

WHAT WAS THE FEEDBACK?

— With respect to the environmental assessment, while no one would favour greater emissions, it should be noted that additional miles are regularly allowed in the interests of reducing or eliminating noise in populated areas. Also, the statement that 'we do not consider proposals that seek to move aircraft noise from one community to another' is contrary to the facts – this is exactly what happened when the new flight paths were introduced. Until then I had never seen passenger jets flying over my home.

— Phase Two – captured noise data must be compared to noise levels predicted in the EIS/TEIA, not against new 2020 modelling.

WHAT DID WE DO WITH IT?

— The new flight paths did not seek to shift noise from one community to another. They were the result of a new runway with a new orientation. We seek to strike a balance between track miles and community impact in our flight path design process.

— The TEIA will be used for comparison of modelled against actual, not the 2020/21 modelling.

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DRAFT PIR TOR FEEDBACK – ENVIRONMENTAL ASSESSMENT

WHAT WAS THE FEEDBACK?

— Objectives, measurement tools and methods for assessing sustainability, particularly in relation to intergenerational equity should be adopted and addressed in any impact assessment of the project. eg. the degradation of amenity and the acoustic environment of previously unaffected communities over the planning horizon for the project and beyond ie. What degree of health and wellbeing decline might be anticipated from a perpetual decline in amenity and cumulative effects of perpetual creep in background noise levels?

WHAT DID WE DO WITH IT?

— Intergenerational equity is not part of Airservices Standards for EPBC Act consideration. Our NOS includes consideration of the "noticeability" of any change. This seeks to identify locations that would, as the term suggests, "notice" the change, be they newly affected or subject to some existing aviation activity. This consideration does not extend to health and wellbeing measures, due to the lack of ICAO accepted criteria for this assessment.

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DRAFT PIR TOR FEEDBACK – NAPS

WHAT WAS THE FEEDBACK?

— The NAPs are vitally important as part of reducing the impact on the region. The NAP review must be undertaken both in and out of tower hours.

— Potential improvements to NAPs should include load sharing.

— Will NAPs include helicopters, aircraft training activities and joy flights?

— An opportunity exists to utilise NAPs as part of a broader noise exposure management system. These opportunities should be explored and measures devised where improvements in noise emissions can be afforded to communities through noise abatement procedures.

— Clarity is needed on how ASA will undertake the Noise Abatement Procedure (NAP) review in Phase One, as it appears that NAP feedback from the community and industry is split across both Phases One and Two, but with the outcome of the review to be published during Phase One.

WHAT DID WE DO WITH IT?

— The NAP operation will be reviewed inside and outside tower hours. **Have added clarification in the TOR.**

— Not sure what "load sharing" is referring to in relation to NAPs, but this can be submitted for consideration as part of the PIR.

— If the community would like to submit specific requests for NAPs this can do this through the PIR.

— This is the purpose of NAPs and is part of the PIR scope as described in the TOR.

— Phase one will review how the NAPs have performed since implementation and identify any improvements that may be required. Phase two will consider the NAPs following return to representative aircraft movements to also determine if any improvements may be required.

COVID-19 has seen airlines flying different planes due to changing demand patterns. Thus the way the NAPs work during COVID could be different to what they do with more representative movements.

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DRAFT PIR TOR FEEDBACK – NAPS

WHAT WAS THE FEEDBACK?

— ASA have indicated that the NAP review in Phase One will assess if the NAP's have 'provided the desired result'. ASA's desired outcomes need to be clearly articulated and include evaluation criteria and an assessment of the 'impact' on the community through specific community feedback.

WHAT DID WE DO WITH IT?

— The desired result will depend on what the NAP was put in place to address. The question we seek to answer is "is the NAP doing what it was supposed to?"

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DRAFT PIR TOR FEEDBACK – NCIS COMPLAINTS

WHAT WAS THE FEEDBACK?

— Community Noise complaints should be included in the PIR.

— I understand that complainants have been advised by ASA not to make further complaints. This seems at odds with the desire to identify the extent and frequency of flights. How can complaints be adequately assessed if residents are discouraged from lodging complaints. Adequate data is surely the crux of this issue.

— The use of the data from this and other noise complaints mechanisms should not be considered until the number of flights and types of aircraft cease being impacted by COVID-19. Many residents will tolerate the noise they experience when it is infrequent, whereas once the number of flights and the range of aircraft types ceases to be COVID-19 affected resident complaints are expected to escalate as the reality of the flight paths overhead is experienced.

WHAT DID WE DO WITH IT?

— Section 13 references "*noise complaints data, investigations, summary and analysis related to Sunshine Coast*" as one of the resources for the PIR. This will definitely be included.

— All complainants are registered and tracked in our reporting. Where NCIS has exhausted all opportunities to respond to or provide information about the complaint, they will advise that they while they will continue to register the complaints they will not respond to the repeatedly raised issue. This is in accordance with our approved complaint handling procedures.

— Noted, however the NCIS data will be used to identify current areas of concern. It will be revisited when air traffic returns to representative numbers during phase two of the PIR.

DRAFT PIR TOR FEEDBACK – NCIS COMPLAINTS

WHAT WAS THE FEEDBACK?

— The community (individuals and groups) have provided a significant amount of qualitative and quantitative data to Airservices NCIS and Community Engagement teams since becoming aware of the project. Airservices must commit to applying that information to assist in completion of the PIRs. Airservices has stated over 500 submissions involving multiple subjects were received for the PIR alone, plus the 'engagement' with 29 Community groups and 400 Individuals. The number of complaints and questions to NCIS and Community Engagement since inception of the flight paths is unknown. The point is, Airservices already has the ANO Report and a significant amount of qualitative and quantitative data from submissions/complaints since the project become known. Why is this data not the foundation for the PIR?

WHAT DID WE DO WITH IT?

— The 500 submissions (plus further submissions for v0.3) are being considered in the development of the TOR. NCIS complaint data will be considered during the PIR and is noted under Section 13 Resources. Community engagement will be central to the PIR. These points are already provided in the PIR TOR. **Have added NCIS data to 7.1.1 for clarity.**

DRAFT PIR TOR FEEDBACK – SOCIAL IMPACT

WHAT WAS THE FEEDBACK?

— How is the Community Social Impact to be addressed? It was raised in the 8/12/2020 'Community Meeting. This was pushed aside by Airservices. The Social Impact is a consequence of Airservices work which has still not been acknowledged as another factor that has impacted the health and wellbeing of people. It is noted that in a new EIA the Social Impact will be reviewed in locations where changes are proposed. So: a) why is it not part of the PIR given the issues this project has caused, and b) where is the data from where it was undertaken for the TEIA?

— The 2018 Commonwealth of Australia document, 'The Health Effects of Environmental Noise' must be in the list and applied to this PIR.

WHAT WAS THE FEEDBACK

— The 2014 EIS assessed the social impact. This was not part of Airservices TEIA or other activity.

  We do not have a process for assessing Social Impact as part of a PIR, nor are there accepted measures to objectively do so. This does not form part of our PIR.

  We will review noise impacts and aircraft operations to determine if this is consistent with our assessment. We will also consider opportunities to reduce the impact of aircraft operation where practicable.

— This document has not been adopted by Airservices as a reference tool for our activity. Australia is a member of the International Civil Aviation Organisation (ICAO) which has the Committee on Aviation Environmental Protection (CAEP). The CAEP monitors the emerging scientific studies in relation to the health impacts of aircraft noise. At this time there is no endorsed ICAO position on aircraft noise exposure levels.

DRAFT PIR TOR FEEDBACK – SOCIAL IMPACT

WHAT WAS THE FEEDBACK?

— The noise impacts from the new flight path for Runway 13 departures has the potential to increasingly adversely affect health and wellbeing of many Sunshine Coast residents in perpetuity as the airport continues to expand it operations. It is not enough to base decisions simply on commercial considerations such as operational efficiency and costs.

— It is important to acknowledge that community welfare should be at the centre of all decisions.

WHAT WAS THE FEEDBACK

— The commercial considerations of airlines is just one consideration in designing flight paths, as per our Flight Path Design Principles.

— Community impacts is one of the considerations in flight path design. Safety will always be our number one priority. There are also constraints within the airspace that are not apparent when looking up at the sky. We will seek to share these constraints and create an understand of how they influence flight path design.

DRAFT PIR TOR FEEDBACK – ENGAGEMENT

WHAT WAS THE FEEDBACK?

— We have yet to consider the CEP but note that the description of the proposed arrangements for a number of activities indicate that the community will be provided with the outcome of an assessment with the tools etc. The community should be provided with the information relevant to the assessment prior to the assessment being finalised consistent with the commitment made in Section 7.1 of the ToR.

WHAT DID WE DO WITH IT?

— Information to support input to specific activities will be provided ahead of that activity. Outcomes of assessments will be presented through a range of mechanisms from reports to meetings, and will include iterative mechanisms for more detailed activity.

DRAFT PIR TOR FEEDBACK – TIMING

WHAT WAS THE FEEDBACK?

— It is not reasonable to request a community response a few days before Christmas (17/12) and expect considered feedback within a month, while most of Australia is enjoying summer holidays.

— Contrary to Airservices statement that 'We do not feel that the engagement process is rushed or flawed and that appropriate time has been provided to consider and input to the TOR' (Q&A v1.0 para 4, p.6), it is obvious the PIR engagement and process is being rushed as flaws are evident in the documentation and the issues were only partially answered or not addressed at all .

— We look forward to receiving ToRv4 for final comments before the ToR are finalised.

WHAT WAS THE FEEDBACK

— While holiday periods are not ideal for detailed engagement activity, this document has already been subject to a previous detailed community review period, two community meetings and over 500 submissions. By 17 January 2021 when the review period closed, four months will have been spent on its development. This is a significant timeframe, and is reflective of the level of interest in the PIR and our commitment to working genuinely with the community to deliver this.

— The TOR has been under development for over four months, has been the subject of two community meetings, two public comment periods and review of around 700 submissions. This cannot be considered rushed.

— The TOR will be finalised after our review of these comments. No further public review period is planned.

DRAFT PIR TOR FEEDBACK – REPORTING

WHAT WAS THE FEEDBACK?

— Section 7.1.1 Phase One Scope states that reports will be publicly available and subject to a community feedback period. However, there is no indication as to how the feedback on the report will be used.

WHAT DID WE DO WITH IT?

— Feedback on the report will be considered in terms of confirming the accuracy of our reporting of inputs and any need for further explanation of the elements covered. Should issues be identified that require further investigation we will respond accordingly. **Have added clarification in the TOR.**

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DRAFT PIR TOR FEEDBACK – ANO RECOMMENDATION

WHAT WAS THE FEEDBACK?

— ASA does not fulfil the ANOs recommendation. Why has the complete environmental assessment process not been included?

— The ANO also directs ASA to (AA-NOS-ENV-2.100) to address environmental issues which do not appear to be present in the TORv.03 and which should be referenced and included in the document.

WHAT WAS THE FEEDBACK

— The ANO did not recommend a complete environmental assessment process, but a PIR not constrained by the EIS.

— Section 5.1 of the TOR states in response to the ANO recommendations:

"The latest version of the NOS will be applied to any flight path changes identified as feasible through this PIR. It will also apply to the delivery of the PIR in terms of the typical scope elements, noting additional engagement activity will be added specific to the ANO recommendation above".

Have added clarification in the TOR.

DRAFT PIR TOR FEEDBACK – ANO RECOMMENDATION

WHAT WAS THE FEEDBACK?

— It is apparent Airservices is focussed upon the Two Recommendations by the ANO with Recommendation One not being discussed in this ToR. The whole ANO report is the learning for Airservices, if the statement is correct that '*The outcomes of PIRs are used by Airservices to inform future change considerations, decision-making, and the continuous improvement of our processes*'. The contents in that ANO Report must be one of the bases of information to be addressed in this ToR and the 'Community Engagement Plan' ToR. People have given an enormous amount of time and energy in providing details, with many being addressed in the ANO Report, so Airservices must not be discounting the content of the Report. The ANO Report is now being treated as a set of bullet points from the Recommendations with dilution of the ANO's findings being shown in the PIR ToR, rather than adopting the detailed information within the Report that Airservices should be applying to the PIRs. The submitters and the ANO surely do not have to go over it all again. The wording in 5.1 needs to encompass these points.

WHAT WAS THE FEEDBACK

— ANO recommendation one is not relevant to the PIR. It was to develop a framework for third party led flight path changes (noted in the TOR for clarity). This has been completed as a separate piece of work and the ANO has advised the Board that it considers the recommendation has been implemented.

The broader findings of the ANO's report have been included in updates to Airservices procedures and in the development of our Community Engagement Framework.

Section 5.1 of the TOR addresses the ANO recommendation relevant to the TOR.

DRAFT PIR TOR FEEDBACK – NOT IN SCOPE

WHAT WAS THE FEEDBACK?

— I request 'Loss of amenity' should form part of the TOR PIR.

— I request a full investigation of the environmental impacts on the Hinterland for current and any proposed new flight paths – not withstanding; fuel dumping, impact on environmentally sensitive National Parks, carbon emissions, rainwater tanks and drinking water contamination from local water reservoirs, impact on birdlife and wildlife including endangered local species.

— Removing any responsibility for flights from Canberra, Cairns, Mackay, Rockhampton and Brisbane (and any other place) does not stop them from being an issue for our residents. I request these flights are redirected back out over the ocean as they were in the past.

WHAT WAS THE FEEDBACK

— This is not within the scope of this PIR.

— This is not within the scope of this PIR.

— The enroute network was not changed as part of the implementation of the new SCA flight paths and is not within the scope of this PIR.

DRAFT PIR TOR FEEDBACK – NOT IN SCOPE

WHAT WAS THE FEEDBACK?

— I request stringent Noise Abatement procedures (NAP's) are put in place and request:

- — 'No fly' times are brought in between 9:30pm & 6:30am in the Hinterland – including training; positioning flights and empty sectors; Alliance Airlines and small, non-essential aircraft etc.

- — A curfew is regarded as "out of scope" for the PIR but surely ASA control the airspace from the SCA so can dictate where and when aircraft are permitted to fly – a 'no fly' over the previously totally peaceful Hinterland is something I request the PIR review.

— I request that Fly Neighbourly policies are mandatory for all GA aircraft using SC Airspace and Airport. Consider punitive measures for GA pilots who break the rules of the Air.

WHAT WAS THE FEEDBACK

— NAPs will be reviewed as part of the PIR and will include community, as well as industry and Air Traffic Control feedback.

— Curfews and other measures that restrict the use of the airport are not part of Airservices remit and will not be considered as part the PIR.

— Fly Neighbourly Agreements are an airport initiative and are not part of this PIR. Airservices has no role in Fly Neighbourly Agreements beyond being consulted. We do not have enforcement powers.

Further information on Airservices responsibilities and that of others will be provided through the PIR. Airservices is a service provider not a regulator. We do not have enforcement powers.

DRAFT PIR TOR FEEDBACK – NOT IN SCOPE

WHAT WAS THE FEEDBACK?

— No data was provided to reveal how many flights were diverted when the N-S 18/36 runway was in operation prior to closure due to supposed wind direction. Other airports (Brisbane and the Gold Coast also have N-S runways). This data of diverted flights over at least five years prior to the 2014 EIS is required for transparency and post-implementation cross-referencing of diversions due to reliance now on the E-W runway.

— The issue was made in my 30/10/2020 submission on PIR ToR v0.2 that "The Queensland State Co-ordinator General raised 225 topics with the Sunshine Coast Council concerning the EIS where 154 were answered 'No' and 10 as 'N/A'. How many of those 225 responses were verified by the Queensland Co-Ordinator General? How many of those 225 responses were verified by Airservices Australia?" Those 225 topics were in fact an amalgamation of issues raised by Individuals, Communities and Organisations. Why are the Queensland State Co-ordinator General and the Federal Environment Minister's requirements not reported in the Background?

WHAT WAS THE FEEDBACK

— This is not within the scope of this PIR. The decision to close runway 18/36 is described in the Sunshine Coast Airport Master Plan.

— This is not within the scope of this PIR. Suggest contacting the Queensland Office of the Coordinator-General.

DRAFT PIR TOR FEEDBACK – OTHER FEEDBACK

WHAT WAS THE FEEDBACK?

— Why was the closure or rwy 18/36 not included in the TEIA?

— Why has ASA accepted the closure of runway 18/36 due to Sunshine Coast Council's claims of a supposed safety risk when a dual runway is preferable for safety, load sharing, environmental and operational purposes?

WHAT WAS THE FEEDBACK

— In publishing new flight procedures there are long lead times for completion of the various activities and lodgement of change requests. The TEIA was completed ahead of the decision to close the runway.

  Airports can make a decision to change their on ground infrastructure at any time – Airservices has no role in this unless it requires new flight paths.

  We assessed the new flight paths that were being created as was the requirement at the time.

— Airservices is not in a position to "accept" the runway closure. We have no regulatory or approval authority. We are a service provider to the aviation industry.

DRAFT PIR TOR FEEDBACK – OTHER FEEDBACK

WHAT WAS THE FEEDBACK?

— Many of these misunderstandings are at least partly attributable to the failure on the part of Airservices and the Sunshine Coast Regional Council to communicate more directly with all affected communities early in the process. However, the grievances remain real and deeply felt, so there is considerable dissatisfaction with the complaints process; it seems that everything residents feel is a reasonable subject of complaint is in fact permitted by law or policy.

— ASA must have a duty of care to not impact individuals, communities and the environment. There is no comment in fulfilling the Duty of Care Airservices owed in either their a) roles and responsibilities or b)ethical behaviour.

— Will the assumptions that are applied to a 'Medium Environmental Risk' rating ever be provided? This has been requested many times and has not been answered, with responses deflected as an 'internal' rating.

WHAT WAS THE FEEDBACK

— We will provide information to the community to clarify as much as possible during this PIR.

— Airservices legislated responsibility is "*to minimise the impact of aircraft operations on communities where practicable*". We seek to do this in our flight path design. This however does not mean "no impact". Aircraft need to fly between locations and this often means flying over communities. We seek to avoid impact on communities where possible.

— The risk classification of Medium in the TEIA talks to Airservices internal risk classification which is assessed using likelihood and consequence criteria. The outcome is used to determine appropriate document authorities within Airservices.

DRAFT PIR TOR FEEDBACK – PREVIOUS FEEDBACK

WHAT WAS THE FEEDBACK?

— How is it possible that out of 500 plus submissions, including multiple topics, that not one change was made to the wording or bullet points for 'Environmental Assessment' between Section 8 (ToR v0.2) and the equivalent re-numbered Section 9 (ToR v0.3)?

— The submissions and engagements are still being addressed internally by Airservices, without involvement of submitters in completing the PIR. With over 500 submissions involving multiple subject items being received and engagement with 29 community groups and over 400 individuals having occurred these inputs do not discount the value of external people actually assisting the completion of the PIR with the PIR team.

— Will the PIR ToR v0.4 include the expectations in this submission? The evidence in the 'Review into processes associated with aircraft noise management' (December 2017) would reveal Airservices is having a cultural problem in applying its own policies? Now is the time to honestly and fully address the issues!

WHAT WAS THE FEEDBACK

— This section outlines our internal process. This is how we assess community suggested alternatives. It is not a negotiable. We added some words to clarify but did not make changes to our process.

— Responses to feedback on the TOR are being shared with all community members via *Engage Airservices* rather than responding to each individual. This is to ensure that all community members have access to the same information.

— The TOR has been updated to include some further clarification. Not all expectations of this submission have been included. This is due to many of the issues falling outside Airservices remit or outside the scope of the PIR. In these instances, and where information is available, we will seek to provide further details during the PIR to address these interests.

DRAFT PIR TOR FEEDBACK – PREVIOUS FEEDBACK

WHAT WAS THE FEEDBACK?

— I noticed at the WebEx that you excluded submissions from residents that were the same as other residents (or more correctly you opted to count identical submissions as one submission). I would like to object to this method of submission account. All submissions should be taken into account, and none discounted as irrelevant. It is not democratic, and fails to take into account the number of residents concerned.

— The document for comment is a 20-page "track changes" document with a page of resources relevant to assessment of the process, a page of abbreviations and acronyms, and a great deal of technical information. This is a document that appears to be focused on meeting legal and policy requirements for the process; it certainly does not encourage public responses to issues of concern. Encouraging participation could have been achieved in a number of ways, including producing an executive summary (referencing the full document as appropriate) or producing one or more documents addressed to specific issues raised by members of the public.

WHAT WAS THE FEEDBACK

— We counted all submissions, including form submissions, in the total number received. We did not include submissions received from the same person by two or more methods (email and *Engage Airservices* for example) where the submissions were identical.

— We provided a clean copy for review as well as the tracked version (upon community request) which showed the changes made based on community feedback.

We have attempted to keep the TOR brief and to the point covering the "what" of the PIR, and have committed to providing the detailed methodology and other complex information in the Community Engagement Plan – the "how" - and through "community friendly" fact sheets and other documentation, however we are balancing competing requests, with other community members request detail be included in the TOR.

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DRAFT PIR TOR FEEDBACK – PREVIOUS FEEDBACK

WHAT WAS THE FEEDBACK?

— With more time as referred above, this may have been clearer. Some content has been moved and some has been newly created. We found that most changes do not reveal the change intent. ASA's public presentation should be clear and fully transparent to the community when it is seeking comment. No explanations have been given and no assistance rendered in plain English in order to interpret the intent and impact of most changed items.

— As was outlined in the Aircraft Noise Ombudsman's Investigation into complaints about the introduction of new flight paths in Sunshine Coast (April 2020) "*It is clear that Airservices received a significant number of submissions and faced a challenging task to absorb and synthesise the substantial amount of feedback.*" I have concerns that Airservices will be faced with a similar scenario and that a two week period may not be adequate to assess feedback from the community and proceed with implementation.

WHAT WAS THE FEEDBACK

— The meeting held on 8 December 2020 sought to provide this clear explanation of how feedback was considered in the updated TOR. It clearly noted what we added, what we would address through other means and what we had not included. The presentation slides and Q&A document were both posted on *Engage Airservices* along with the updated TOR for community review.

— Every comment received has been reviewed and responded to as part of our internal review. Much of the feedback has been addressed in the previous review so only minor changes to the TOR are required.

ACRONYMS

Term	Definition
AEDT	Aviation Environmental Design Tool
ANEF	Australian Noise Exposure Forecast
ANO	Aircraft Noise Ombudsman
ATC	Air traffic control
CAF	Community Aviation Forum
CASA	Civil Aviation Safety Authority
CEF	Community Engagement Framework
dB(A)	Decibels adjusted
EIA	Environmental Impact Assessment
EIS	Environmental Impact Statement
EPBC Act 1999	Environment Protection and Biodiversity Conservation Act 1999 (Cth)
IAP2	International Association of Public Participation
IFR	Instrument Flight Rules
INM	Integrated Noise Model
NAPs	Noise Abatement Procedures
NFPMS	Noise and Flight Path Monitoring System
NOS	National Operating Standard
PIR	Post Implementation Review
ToR	Terms of Reference
VFR	Visual Flight Rules

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