



Investigation of complaints about the proposed Hobart Noise
Abatement Procedure trial

July 2024

1 Introduction

- 1.1 As part of its post implementation review (PIR) of flight paths associated with Hobart Airport, Airservices Australia (Airservices) continues to engage with communities affected by aircraft noise. One result has been consideration of a potential Noise Abatement Procedure (NAP) trial. The Aircraft Noise Ombudsman (ANO) received complaints about delays when Airservices' self-imposed due date for finalisation lapsed and more complaints about the outcome.

2 Background

- 2.1 In September 2017, Airservices implemented new flight paths for Hobart Airport. As was its practice at the time, community engagement prior to the implementation was minimal. Airservices conceded that "it was not adequate"¹ and the then ANO described it as an "absence of consultation".²
- 2.2 The new flight paths introduced satellite-based systems which make aircraft navigation safer and more accurate. These systems require longer flight paths on approach to, and departure from, runways and concentrate aircraft on narrower flight paths. The map below shows the impact of the change – communities located close to the airport suffered less while those further from the airport became affected.

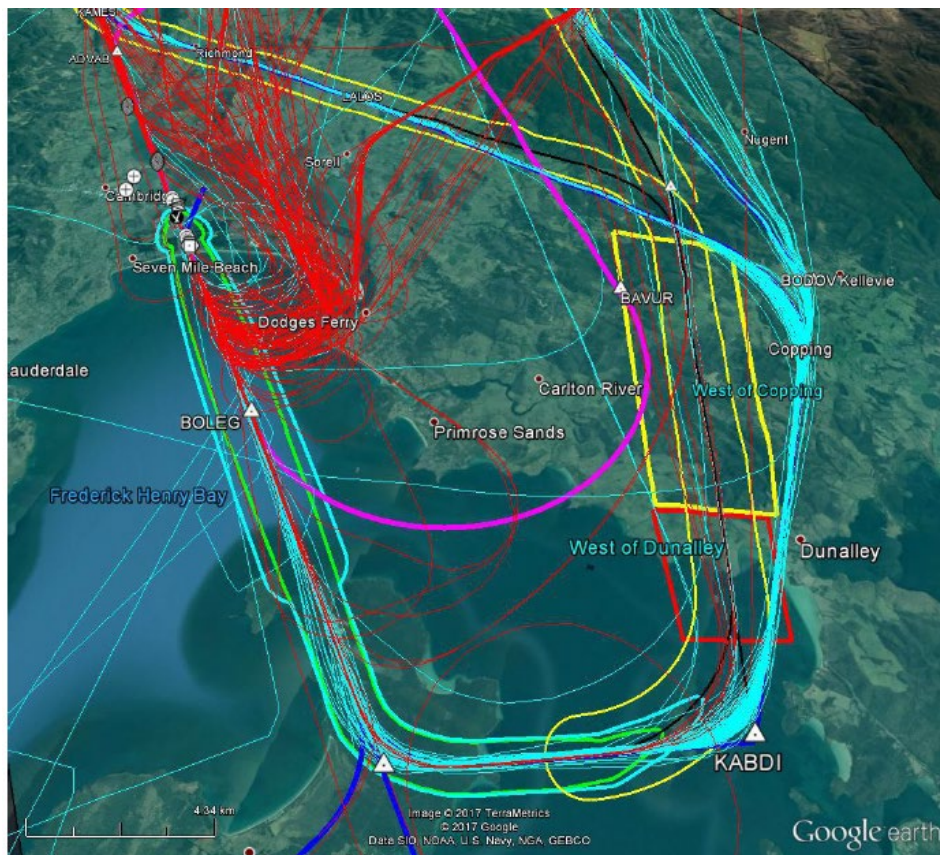


Figure 1 - One week of tracks (1-7 February) before (red) and after (light blue) the new STAR was implemented at Hobart Airport, from [Hobart EA 1239 Supplementary Report 21 November 2017](#), Figure 4, page 8.

¹ Airservices statement, 22 November 2017

² ANO Report, at page 22. [Hobart Noise Improvements Apr2018 Review ASA Response-1.pdf \(ano.gov.au\)](#)

2.3 The Standard Instrument Arrival path (STAR) placed the arrival path over the previously unaffected communities of Dunalley, Boomer Bay, Copping and others. The reaction from these areas was fierce. Airservices held a consultation session in Dunalley on 11 November 2017 and received 71 written submissions. Airservices advised it intended to “implement an alternative flight path with an improved outcome for those affected communities.”³

2.4 The environmental assessment of this alternative path was completed on 21 November 2017 and the map below shows the flight path over Dunalley et al moved westward to sit between Dunalley and Connelly’s Marsh. This was implemented in March 2018.

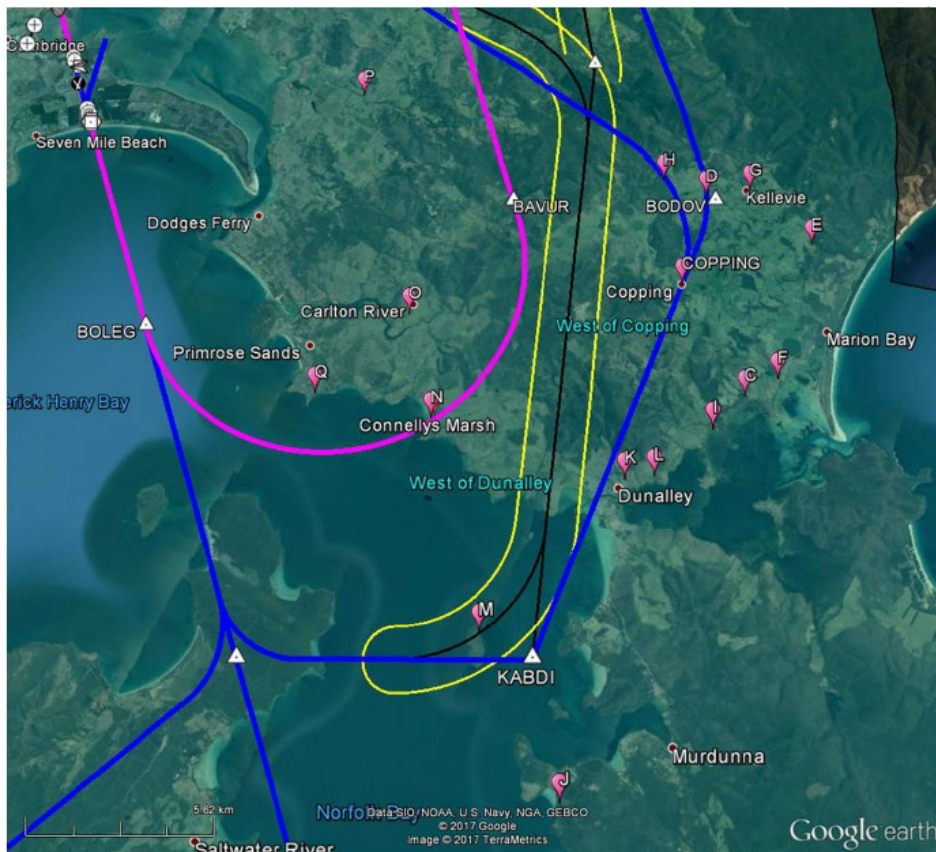


Figure 2 - Reference noise modelling locations under the current STAR and proposed Alternative 2 STAR at Hobart Airport, from [Hobart EA 1239 Supplementary Report 21 November 2017](#), Figure 6, Page 12.

2.5 At the same time, Airservices undertook to engage with the community and generally review the flight paths around Hobart. This process took place from early 2018 until implementation in March 2019.

³ Airservices statement, 22 November 2017

3 The broader review – 2018 to March 2019

- 3.1 Airservices engaged a consultant to manage community engagement. The then ANO and staff attended some community consultation sessions and noted a high level of anger from the community and confusion about the flight path plans put to them. The ANO received 17 written complaints in 2018 and a further 15 in 2019. Complainants were dissatisfied with both the process and outcome. They alleged misconduct at some community engagement sessions; that the process was not responsive to the community; that it was designed to support Airservices' desired outcomes; that the option of flight paths to the west of the airport had not been adequately investigated and that the whole project should have been reported to the Minister for the Environment under the *Environmental Protection and Biodiversity Conservation Act*, because of its significant impact.
- 3.2 The ANO reviewed these complaints determining that the western option was not viable nor was referral to the Minister required under Airservices' then protocols for determining a "significant" environmental impact. Regarding the incidents occurring during the community engagement process and the outcome, there was insufficient basis for further action by the ANO. Nevertheless, one aspect of the Airservices redesign at this time is necessary to understand the current complaints.
- 3.3 As part of its review Airservices held two meetings with a Stakeholder reference panel. The notes of the meeting of 14 September 2018 record the airline industry support of the new guidance systems and its desire to minimise track miles.
- 3.4 Airservices' review proposed a new flight path over a previously unaffected area with a greater population than the Dunalley corridor - Primrose Sands and Carlton as shown in the map below.



Figure 3 - Final Design (March 2019) - Zoomed in image showing Runway 12 departures and Runway 30 arrivals in the South East region; arrivals (yellow); departures (blue); waypoints (white triangles), from Airservices' Hobart-Airspace-Design-Review-Final-Report-March-2019, Figure 4, page 23.

- 3.5 The yellow Runway 30 RNAV path appears to be the successor of the path moved west from Dunalley in March 2018 which lay between Dunalley and Connelly’s Marsh, but it appears to have been moved further west away from Dunalley and closer to Connelly’s Marsh. In addition, a new arrival path was added to the design – the yellow Runway 30 RNP-AR path on the map, providing a shorter route but traversing more populated areas than the RNAV approach.⁴
- 3.6 The RNP-AR path provides a benefit to industry by reducing miles flown and saving on fuel expenses. There is a consequent environmental benefit in that carbon emissions from fuel burn are lessened.

Community engagement on the RNP-AR path

- 3.7 As noted above, the then ANO attended a number of community engagement meetings and noted confusion in the community over the introduction of the RNP-AR flight paths. While generally regarded as a good thing, there were concerns about their placement and the impact. Airservices’ final report noted, regarding the new RNP-AR track:

Consideration: This design element was generally accepted by stakeholders. Some community stakeholders expressed concern regarding the location of the track and the expectation of concentrated overflight on a known and predictable path. Others sought to have the turn on the Smart Tracking (RNP-AR) approach adjusted to ‘tighten’ the turn, so as to move the potential audible effect away from some communities. Some community members queried whether the same flight path could be used for the Smart Tracking (RNP-AR) approach, and the RNAV approach. This is not possible due to the different design criteria and constraints required, and the opportunity to provide a shorter and longer approach to improve operational efficiency. The Smart Tracking (RNP-AR) approach, could not be further adjusted due to design constraints and criteria to ensure stable approaches for the final stages of flight. Outcome: This proposed design element has been accepted in the final design.⁵

- 3.8 Airservices dismissed the community question asking that the RNP-AR track follow the same path as the RNAV track, finding it was not possible due to design constraints and the operational efficiency of a short and long approach. The “design constraints and criteria” for not having the RNP-AR and RNAV on the same path were not elaborated upon, presenting the community with an opaque reason which could not be challenged.
- 3.9 The operational efficiency of a shorter and longer approach apparently refers to the more efficient sequencing of arriving aircraft. This would be relevant in peak traffic periods despite the relatively low volume of traffic at Hobart overall. The final reason - that the RNP-AR approach ensures more stability in the landing process does not compare the stability of the RNAV approach or consider converting the RNAV approach to accommodate the RNP-AR.

⁴ RNP-AR is a more advanced system than RNAV. RNP-AR has greater accuracy. Like RNAV, it relies on satellite guidance.

⁵ [Hobart-Airspace-Design-Review-Final-Report-March-2019-1.pdf](#), at page 11

4 Post Implementation Review

- 4.1 Following implementation of the new flight paths, Airservices undertook a Post Implementation Review (PIR). The PIR heard various community suggestions that the RNP-AR path be moved further east to relieve noise pressure on more populated areas. These were analysed in some detail and the option of a NAP moving flights on the RNP-AR flight path to the RNAV path at certain times of the day was approved to proceed to further assessment.⁶

5 The proposed NAP

- 5.1 Airservices' final report recommended a 6-month trial of a NAP which diverted planes from the RNP-AR track onto the RNAV track from 2 pm to 8 am. The report was detailed and thorough, setting out the engagement process and thoroughly evaluating the relevant material.⁷

- 5.2 Without traversing the report in detail, the reasons for recommending the NAP trial included:

- Increased traffic on the RNP-AR - the environmental assessment for the introduction of the RNP-AR in 2018 estimated that 33% of arrivals would use the RNP-AR rather than the RNAV tracks but current usage of the RNP-AR was 80% of arrivals. Without intervention, this trend is expected to continue or even increase as more aircraft become RNP capable.
- More noise sensitive and heritage listed sites under the RNP-AR.
- Greater numbers of dwellings and population suffering greater than 60dB(A) noised levels under the RNP-AR.
- A detailed assessment against the Flight Path Design Principles favoured the trial.
- A majority of respondents to the engagement process (53-47%) favoured the trial.

- 5.3 The decision, however, rejected the recommended trial for the following reasons:

Despite significant effort to investigate possible change from both a technical and community outcomes perspective, the work conducted has not provided a compelling case that on balance that there is any material community demand and/or significant benefit in making further change. Specifically:

- *Engagement with the community resulted in 53% vs 47% desiring the change*
- *No possible change has been identified that drives any material environmental/noise benefit, particularly when balanced with emissions outcomes*
- *Airservices obligations require that safety is always our first priority. There is an absence of a material driver from an environmental/community outcomes*

⁶ [Hobart - Post Implementation Review - Final Report.pdf](#), at page 32

⁷ [Hobart Airport Noise Abatement Procedure \(NAP\) trial proposal - Flight Path Design Assessment Outcome \(with decision\).pdf](#)

perspective against which to balance inherent risk associated with the introduction of further change to this airspace.

- 5.4 The majority of responses in favour of the trial were cited in support of the status quo on the basis that it was not a large enough majority and it was unclear what Airservices would have considered a sufficiently large majority to support the proposed trial. A flight path sharing noise equally between two communities is likely to be equally objectionable to both and votes for and against are likely to be close or evenly divided.
- 5.5 The statement that “no possible change has been identified that drives any material environmental/noise benefit” took as immaterial the evidence presented in the report that noise would be reduced for residents under the RNP-AR. It may be that the caveat, “particularly when balanced with emission outcomes” implied that the environmental detriment of greater emissions outweighed or negated the environmental benefit of noise reduction. However, emissions, noise and other environmental impacts are all distinct and relevant considerations under the Flight Path Design Principles, the application of which are assessed in the report and favoured the NAP trial.
- 5.6 Finally, safety, the highest priority, was relied on in support of doing nothing. There appears to be no appreciable safety risk to adopting the NAP - both the RNP-AR and RNAV are established flight paths and in use, with both procedures having been assessed for safety at the traffic levels comparable to those proposed by the NAP trial. Any overriding “inherent risk” to safety that negated the trial proceeding should have been clearly explained in the report to the public.

6 Airservices actions in response to the ANO assessment under Clause 57 of the ANO Charter

- 6.1 The ANO provided its assessment of the related complaints to Airservices’ management on 11 September 2023, as required under Clause 57 of the ANO Charter. Under Clause 57 a reasonable opportunity must be accorded to Airservices to resolve the matter. The ANO assessment included two recommendations:
- i. Airservices should reconsider the outcome of the Hobart NAP trial consistent with the Flight Path Design Principles and provide cogent reasons for its decision.
 - ii. In situations where the final outcome is different to the recommendation made in the final report, Airservices should include a detailed explanation that clearly identifies the factors which were considered and how these contributed to the final decision being made. This is important to ensure community understanding and trust in the process.
- 6.2 On 23 September 2023, in response to the ANO assessment, Airservices committed to conducting an end-to-end review of its decision-making procedures and processes regarding the implementation of flight path changes proposed as a result of community engagement.

- 6.3 Airservices' original decision on the Hobart NAP trial was set aside by Airservices' Chief Executive Officer on 30 October 2023. A number of actions were identified and completed between November 2023 and May 2024 and Airservices determined to proceed with the NAP trial which commenced on 13 June 2024. This aspect of the complaints is consequently considered resolved.
- 6.4 In response to the ANO's second recommendation, it is understood that a review has been conducted but the ANO has yet to be advised of the outcome, approximately 9 months after Airservices committed to the internal review.

7 Conclusions

- 7.1 Airservices' Community Engagement section prepared a detailed, thorough assessment of relevant evidence and material to propose a modest recommendation for the trial of a NAP. The reasons for rejecting that recommendation by senior management appeared to be partially irrelevant and/or arbitrary and undermined any confidence in affected community members that their interests had been fairly and properly taken into account.
- 7.2 Despite progress by Airservices in developing its practice of community engagement since the opening of Brisbane Airport's new parallel runway, there remains no clear process for making flight path changes that are proposed as a result of community engagement activities.

8 Recommendations

- 8.1 Airservices should prioritise the implementation of recommendations identified through its review of the end-to-end decision-making processes related to flight path changes where related to noise improvement opportunities identified through post-implementation reviews or suggestions made to Airservices by community members. The procedures developed as a result of the review should ensure that the responsibilities of decision makers and relevant considerations are clear to all relevant sections of Airservices. The procedures should also require publication of the outcome and reasons for the final decision. Airservices should also implement appropriate training in the updated processes to ensure understanding and compliance across all sections.