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**environmental  
protection uk** 02 October 2009

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## **Stansted Airport Draft Noise Action Plan 2010-2015: A response from Environmental Protection UK**

We are writing in response to your consultation on the new draft Noise Action Plan 2010-2015. Environmental Protection UK has considered the consultation documents and welcomes the opportunity to comment

### **1. About Environmental Protection UK**

Environmental Protection UK brings together organisations from across the public, private and voluntary sectors to promote a balanced and innovative approach to understanding and solving environmental problems, through policy development and education. We are a registered charity with 110 years experience of environmental campaigning, public information provision, producing educational resources and policy formulation.

Environmental Protection UK's membership includes policy makers, regulators and practitioners from local authorities, consultants, developers, academics, industry and interested NGOs.

### **2. Policy Context**

Regulations implementing the Environmental Noise Directive should be aiming to achieve the following policy goals, and our comments are made in this context.

Environmental Noise Directive 2002

The aim is *"to avoid, prevent or reduce on a prioritised basis the harmful effects, including annoyance, due to exposure to environmental noise."* And to produce *"action plans designed to manage noise issues and effects, including noise reduction if necessary."* *"...plans shall also aim to protect quiet areas against noise."*

The directive applies *"to environmental noise to which humans are exposed in particular in built-up areas, in public parks or other quiet areas in an agglomeration, in quiet areas in open country, near schools, hospitals and other noise-sensitive buildings and areas."*

2006 EU sustainable development strategy

*"reducing transport noise both at source and through mitigation measures."*

### **3. Overview**

Overall we feel that the noise action plan falls short of the intentions of END and that no meaningful effort has been made to avoid, prevent or reduce the noise impact of

operations at Stansted beyond the measures that have previously been in place. The projections of increasing Air Traffic Movements and the failure of the Noise Action Plan to introduce meaningful actions that would stimulate the introduction of quieter aircraft in the future at Stansted it is likely that the area of the 55 L<sub>den</sub> contours will increase without meaningful action.

The aim and intentions of the European Noise Directive (END) as stated above do not appear to be met by this action plan in its current form. This is primarily due to the lack of any prioritisation of measures or areas within the surrounding communities to mitigate environmental noise from the airports' operations.

### **(3.A) Responsibility for Noise Control**

Further to the above issues the action plan states on page 12 that Stansted Airport Limited (STAL) is not responsible for implementing and controlling all the noise measures in place at Stansted airport and that DfT among others have control over these measures.

The action plan does not provide an explanation as to roles that each organisation has with regards to noise control at Stansted and how these affect current and potential noise measures. In the interest of transparency a full and clear explanation should be included within the action plan to allow the general public to understand the procedures that are undertaken at Stansted airport in terms of noise control and mitigation.

The action plan states that recommendations by the airport operator can be made to the organisations that control noise measures at Stansted but cannot directly implement them, however, no recommendations on how to improve noise controls appear within the action plan even though there are a number of recommendations that could and should be made to improve the noise climate around Stansted.

### **(3.B) Night Time Quota Count (QC)**

The current and future Night Time Quotas as shown on page 15 of the noise action plan only run until 2012, however, as the action plan is set to run from 2010-2015 we believe that Stansted should recommend to DfT that they consult now on setting the night time quotas until 2015 in order to provide a full transparent action plan to the general public. Furthermore, we believe that in the interest of avoiding further environmental noise STAL should recommend to DfT, within the action plan, that 'no further increase, and where possible a reduction, in the setting of Night Time Quota levels and Air Movements be introduced for the rest of the period of the noise action plan.'

The current night quotas, as controlled by DfT, state 'QC' night as being between 23:30 – 06:00. This timeframe for night differs from the general consensus of night, but more importantly from the recognised 8 hour 'END night' of 2300 – 07:00. STAL should recommend to DfT - within the action plan - that the Night Time Quota and Air Movement limits be extended to encapsulate this "shoulder" period between QC night and END night. Alternatively STAL should recommend to DfT that a separate "shoulder" period with Quotas Count and Air Movements limits be established to limit noise events bunching up in the "shoulder" periods due to the QC night time restrictions.

### **(3.C) Noise Health and Attitude Research**

STAL should seek to recommend within their action plan that further research be carried out by DfT/DEFRA into the effects noise has on human health, as well as implementing rolling attitude surveys that would not only be more cost effective but allow airport

operators as the 'competent authority' to better understand their noise impact and determine what is 'acceptable' noise to those exposed to noise caused by airport operations. This type of research would also help aid government and operators in determining at what level the onset of annoyance from aircraft noise occurs. At a local level, public attitude surveys would serve to foster better community engagement as well as inform the NAP process.

### **(3.D) Continuous Descent Approach (CDA)**

Environmental Protection UK welcomes the inclusion of CDA procedures for arriving aircraft where this is in accordance with safe operating procedure. We believe that the inclusion of CDA on easterly operations should be implemented assuming safe operating procedures are met.

As part of providing a transparent noise plan STAL should seek to publish figures showing the percentage of aircraft achieving continuous descent approach and should also look to 'name and shame' those airlines that consistently fail to achieve CDA.

The noise action plan should provide a clearer explanation of CDA. Nowhere is it mentioned that CDA is achieved using a glide path of 3° by not including one of the key elements of achieving CDA STAL are failing to provide a fully transparent noise plan to the general public.

Further to this is the reporting of aircraft achieving CDA, STAL should state that aircraft that achieve a glide path shallower than 2.5° (unless the aircraft model is independently identified as providing further benefits from a shallower glide path than 3°) will not be considered as having achieved CDA.

The CDA procedures need to be administered and reported correctly so as to minimise the amount of environmental noise from aircraft on approach to the airport. Failure to adhere to CDA procedures when safe operating conditions exist and the misreporting of aircraft completing CDA would lead to residents of the local community experiencing more noise and distress due to aircraft approaching much lower than they should or normally would.

### **(3.E) Acoustic Insulation Scheme**

Environmental Protection UK welcomes the formal inclusion of Stansted's acoustic insulation scheme, however, it is clear that this scheme is one that has already been in place for some years. We feel it would be appropriate to use the action plan as a means to improving upon the current insulation scheme and to make commitments that would benefit the wider community. We believe community buildings, such as, libraries and places of worship should be considered for inclusion within the 'noise-sensitive' building category (alongside schools and hospitals) at Stansted. This would have real and meaningful benefits to many people in the communities around Stansted.

The area available for acoustic insulation is stated in the action plan as being within the 63dB(A)  $L_{eq}$  contour (and for residential property requires there to be a noise increase of 3dB on the previous noise climate, we believe that this area should be expanded beyond its current limits in the interest of reducing noise exposure in the areas surrounding Stansted. A phased expansion of the area covered within the acoustic insulation scheme would prioritise the targeting of Stansted's noise mitigation scheme to those who are initially more 'needy' of receiving the acoustic insulation. Furthermore, insulation

packages should be made available to homes that have not received insulation grants within the last 20 years.

STAL should also consider on case-by-case basis whether the use of standard acoustic secondary glazing packages will be sufficient and should consider providing help in insulating walls and ceilings where this is necessary e.g. 'temporary' classrooms (which often remain for years).

With regard to environmental noise from aircraft operations at schools the action plan provides an opportunity for Stansted to commit to introducing programmes addressing the outdoor curriculum, an issue that is recognised in the 2003 Air Transport White Paper but so far has not been acted upon.

### **(3.F) Noise Preferential Routes**

With the improvements in aircraft navigation systems it is now possible for planes to follow Noise Preferential Routes more precisely. This helps with the long established government policy of concentrating flight paths as a means to reduce the number of people affected by noise. However, it is important that the action plan recognises that the levels of noise concentration in the future may become such as to merit the examination of respite or limiting growth in air traffic movements along these routes in future which experience high noise exposure i.e. 70dB L<sub>den</sub>.

Similarly little attempt seems to have been made to relate the Noise Action Planning process clearly to that being followed by NATS in airspace redesign on behalf of CAA. The noise action plan provides an opportunity for clarification of this which should be utilised.

### **(3.G) Quiet Areas in Agglomerations and Tranquillity in Rural Areas**

The action plan does not commit to honouring quiet areas in agglomerations retrospectively. As it is likely that these quiet areas will be identified after the noise action plan is in effect, the action plan must contain a commitment that the STAL will do all that is reasonably possible to safeguard these quiet areas from exposure to environmental and aircraft noise due to the operations of Stansted International Airport

Similarly END calls for consideration to be given to environmental noise in quiet areas in open country, however, no consideration is given to this within the noise action plan for the airport. Since the publication for consultation of the action plan the Transport Select Committee has stated its concern over the changing use of airspace over tranquil areas<sup>1</sup>.

Further to this is the protection of AONBs and National Parks from aircraft noise to and from planes to and from Stansted. DEFRA guidance states that:

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<sup>1</sup> The Transport Committee's Fifth Report 'The use of airspace'  
'Current guidance appears to allow unchecked increases in aviation activity over these areas. Without some level of constraint, the noise environment in these areas might degrade progressively as traffic increases.'

The DfT and the CAA should examine the case for adopting maximum limits on noise levels and numbers of aircraft permitted per hour over sensitive areas such as National Parks and Areas of Outstanding Natural Beauty. The DfT should fund exploratory research on evidence-based limits.'

*'It has been long established that where it is possible to avoid over-flights of National Parks and Areas of Outstanding Natural Beauty below 7000 feet, it makes sense to do so, provided it does not add to the environmental burdens on more densely populated areas.'*

The action plan should include commitments to work with the relevant organisations, such as, CAA, NATS, DEFRA, DfT etc. to reduce noise disturbance, the frequency of noise events and maintain tranquillity over the rural communities surrounding Stansted and any AONBs and National Parks that may be affected by over flight from Stansted's airport operations. This will of course need to be balanced against undue impact on populations.

### **(3.H) Noise Acceptability**

Finally as STAL has been made the competent authority in creating the noise action plan for Stansted there is a real cause for concern that there are conflicts between the interest of the airport, the noise maker, as a business and of airport neighbours as receivers of noise. To remove this business conflict from the remit of the airport operator, we feel that STAL should introduce into the Stansted Noise Action Plan a recommendation that the government provide them with meaningful guidance on acceptable noise levels.

## **4. Consultation Questions**

1. To what extent do you think that STAL's noise strategies outlined in the draft noise action plan are targeting the most important problems in relation to aircraft noise?

*The STAL noise strategy as outlined in the draft noise action plan does not effectively target the most important problems in relation to aircraft noise. There is no prioritisation of the actions that are outlined within the noise action plan and many key issues are not acted upon. Please refer to the comments provided in question 5 on the Stansted Airport draft NAP, namely I refer you to sections 3.A, 3.B, 3.C, 3.E, 3.G and 3.H.*

2. To what extent do you think that the draft noise action plan provides a suitable framework to manage aircraft noise?

*The action plan does not provide a suitable framework to manage aircraft noise. Nor does it meet the aim of the END which is 'to avoid, prevent or reduce on a prioritised basis the harmful effects, including annoyance, due to exposure to environmental noise'. Please refer to the comments provided in question 5 on the Stansted Airport draft NAP. Namely we refer you to sections 3.A, 3.B, 3.D, 3.F and 3.G, which outline some of the major omissions and issues within the noise action plan.*

3. The draft noise action plan proposes a number of performance indicators to measure progress in implementing the action plan. To what extent do you think that these performance indicators are sufficient?

*Please refer to the comments provided to question 5, namely sections 3.B, 3.C, 3.D, 3.F, 3.H*

4. As part of its objective to limit and where possible reduce the impacts of aircraft noise, Stansted has set a benchmark goal to be in the top fifth of airport companies for best practice in international airport noise management on comparable sites. To what extent do you think that this goal is sufficiently challenging?

*The objective of Stansted Airport Limited should be 'to be the best airport company for best practice in international airport noise management on comparable sites'. BAA's long term objective should also contain the phrase 'to avoid, reduce and prevent where possible environmental noise as a result of airport operations'*

5. Do you have any other comments on Stansted Airport's draft Noise Action Plan?

*Comments on Stansted Airport's draft Noise Action Plan are outlined above at 3 in our Overview*

If you have any questions or comments, please contact us.

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October 2009