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RESPONSE TO STANSTED AIRPORT LTD BAA NOISE ACTION PLAN CONSULTATION

30 September 2009

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Q1. To what extent do you think that BAA Stansted's noise strategies outlined in the draft noise action plan are targeting the most important problems in relation to aircraft noise?

Answer: "Not at all"

Q1a. Why is that?

- The Environmental Noise Directive 2002/49/EC (END) states at the outset (Article 1: Objectives) that *'The aim of this Directive shall be to define a common approach intended to avoid, prevent or reduce on a prioritized basis the harmful effects, including annoyance, due to exposure to environmental noise.'*
- The draft noise action plan (NAP) does not achieve this aim. It does not contain specific proposals to avoid, prevent or reduce the harmful effects on the community of aircraft noise both close to the airport and under the associated flight paths. The region around Stansted Airport is largely rural with low background noise levels and therefore relatively tranquil. The END is clear in that it applies to environmental noise *'in quiet areas in open country'* (Article 2: Scope). Aircraft noise complaints for aircraft using Stansted Airport are routinely received from residents living up to 25 miles from the airport and sometimes much farther away.
- The NAP mainly relies on hopes for the introduction of less noisy aircraft over time which, while welcome, would not in practice offset the noise impacts of the increased number of aircraft foreseen by BAA's expansion plans for the existing runway. Nor are these hopes of less noisy aircraft properly quantified in terms of actual noise reduction figures and associated timescales.
- Stansted Airport has permission to expand to 35 million passengers per annum (mppa) and to 264,000 aircraft movements per annum (ATMs). This compares to approximately 20 mppa and 160,000 ATMs forecast for 2009. The NAP does not address these additional sources of noise.
- The NAP does not contain any incentives to encourage the introduction of less noisy aircraft to stimulate better practices.
- The NAP provides for wholly inadequate levels of fines to discourage noisy and off-track aircraft.

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- Scarcely any figures are provided for the actual levels of noise reduction that would be achieved by the NAP.
- Definite timescales are lacking in many cases – something that is especially significant in the context of BAA's programme for major expansion at Stansted on the existing runway.
- The END requires the NAP to contain estimates of the reduction of the number of people affected by noise, such as through sleep disturbance. This has been ignored by BAA which has failed to provide these estimates in the NAP.
- The NAP needs to go further in specific, quantifiable actions to reduce noise, particularly at night.
- The NAP does not mention helicopter operations. Measures to reduce helicopter noise annoyance should be included.
- The noise abatement departure procedures should not be balanced against potential savings in airlines' fuel costs, which in any event are understood to be marginal, and the consequent effects on NO_x and CO₂.

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Q2. To what extent do you think that the draft noise action plan provides a suitable framework to manage aircraft noise?

Answer: "Not at all"

Q2a. Why is that?

- The NAP does not offer any additional actions to reduce noise over those which are already in place. It is mostly a list of measures that currently exist and which in themselves are seen as inadequate by many of those affected by the adverse effects of aircraft noise.
- The NAP also lacks a step-by-step plan to reduce noise annoyance in line with the Government's stated intention to meet the World Health Organisation Guidelines for Community Noise by 2030. The NAP should provide a step-by-step programme to avoid, prevent or reduce noise in the period through to 2015 that accords with this Government intention.
- The numbers for population and dwellings affected provided by the NAP are inconsistent with the noise mapping results and underestimate the numbers affected. This is set out in detail under Q5 below and these inconsistencies need to be corrected.
- The indices used for the various noise levels in the NAP are, in four out of five cases, non-compliant with the requirements of the END. This is set out in detail under Q5 below and these discrepancies need to be corrected.
- There are insufficient noise limit values provided in the NAP to be able to determine whether the END requirements can be met. More quantifiable limits, targets and timescales are needed to make the NAP meaningful and effective.
- Comparisons of 'before' and 'after' implementation of the NAP need to be added, for example, tables of people and dwellings affected in each noise band.
- BAA does not propose any sanctions if it fails to deliver on any of the targets it has set itself. There should be quantifiable sanctions if BAA fails to meet the targets.

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- There needs to be an independent overseer (rather than BAA or DfT) to represent the interests of the local community and ensure harmful noise exposure is addressed as set out in the END.

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Q3. 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?

Answer: "Not very sufficient"

Q3a. Why is that?

- The proposed performance indicators are limited, vague and give too much room for inaction. It is not good enough to simply 'review' or 'track' issues when the END requires noise to be reduced, especially if flight numbers at Stansted increase.
- The NAP should include performance indicators that establish quantified noise reduction targets and show how progress is measured towards achieving them.
- The END states that supplementary noise indicators may be used and gives examples of the types of situations for usage such as where the low frequency content and tonal components are strong. It also gives examples of the types of special noise indicators for usage such as LAmax, or SEL for night period protection in the case of noise peaks. Both these types of situations and noise indicators are applicable to aircraft noise. The NAP should contain these indicators to assist in measurement and reduction of noise exposure.
- The performance targets proposed in the NAP for supporting actions (e.g. to improve communication with the public) will not reduce the harmful effects of noise in themselves. Priority should be given to actions which actually reduce noise.
- No estimates are provided for the reduction of the number of people affected by the measures proposed in the NAP. This is contrary to the minimum requirements of the END which states that *'each action plan should contain estimates in terms of the reduction of the number of people affected (annoyed, sleep disturbed, or other)'*. This omission should be rectified.
- Air quality figures and predictions should be reviewed in concert with the forecast reduction of the number of people affected by aircraft noise as a result of the measures proposed in the NAP.

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- Clear timescales should be provided for each performance indicator.
- Quarterly detailed statistics for noise complaints should be used as performance indicators to measure progress in the community's perception of the reduction in noise.

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Q4. 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?

Answer: “Not at all challenging”

Q4a. Why is that?

- This objective/benchmark goal does not in itself reduce noise. The END's aim is to avoid, prevent or reduce noise and this should be the sole objective of the NAP.
- International benchmarking, especially of 'best practice', is a vague and imprecise concept and it would be virtually impossible for members of the public to check any such claims made by BAA.
- The NAP should be primarily judged against its own targets and whether it meets the objectives of the END. As stated above, the NAP does little more than is already done.
- The nature of Stansted Airport, predominantly short haul flights operated by low-cost carriers using modern aircraft, is such that being in the top fifth of airport companies for noise management is hardly a challenging goal.

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Q5. Do you have any other comments on Stansted Airport's draft noise action plan?

In Section 7 of the NAP, BAA provides the '*Results of the 2006 Noise Mapping*' for which our comments are given below.

The aim of the END as stated at the outset (Article 1: Objectives) is to define a common approach. It is therefore a major concern to find that the NAP falls at the first fence by failing to follow a common approach for the numbers of people and dwellings affected by aircraft noise.

The results of the noise mapping are one of the primary information sources for the noise action plan. However, the estimated numbers of affected people and dwellings given in Section 7 are not the results of the 2006 noise mapping at all and thus misrepresent the real picture.

The 2006 noise mapping, together with the figures for affected people and dwellings, was officially carried out by the Civil Aviation Authority (CAA). However, the figures for affected people and dwellings provided in Section 7 are from the Department for Environment, Food and Rural Affairs (Defra) and differ from the official CAA results in the following key areas:

- The CAA figures were all published in 5 decibel contour bands for the five different noise indices in compliance with the END.
- Defra published its figures as cumulative totals in steps of 3 decibels for four out of the five different noise indices. This is a totally different method and not compliant with the END.
- The significance of this is that it is impossible to reconcile four out of the five sets of Defra figures given in the NAP with CAA figures that should have been used.
- In the only case where it is possible to reconcile these two different sets of figures, the Defra figures understate the affected population and dwellings by 600 (6%) and 350 (8%) respectively. It is impossible to know what the discrepancies are for the other four sets of noise indices.
- Where Defra says in the NAP that the number of people affected is 9,400, the CAA figure is 10,000. This discrepancy sheds doubt on the accuracy of the draft NAP.

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- Public consultation should have taken place on the basis of accurate and consistent data. Corrected figures should be published.

In Section 9 of the draft NAP, BAA sets out its '*Approach to Managing Noise*'. Our comments on this are given below with the same paragraph numbering maintained.

Paragraph 1a. Quietest fleet practicable

- BAA does not state how Chapter 4 aircraft will be prioritized, nor does it indicate the noise reduction that will result.
- While voluntary phasing out of Chapter 3 high aircraft is welcomed, it is not stated how this will be achieved (for example, how airlines will be incentivised to comply) and what noise reduction will result. It is insufficient just to review landing fee differentials. Examples of potential widened landing fee differentials should be stated together with the anticipated effect on noise reduction. Chapter 3 high aircraft landing fees should be at least 100% more than for Chapter 3 aircraft. Chapter 3 minus and Chapter 4 aircraft landing fees should be no more than 50% of Chapter 3 aircraft landing fees.
- Airline League Tables for noise and emissions rankings are welcomed. However without incentives to reward airlines which reduce noise impacts, or disincentives to penalise airlines which do not, these league tables will not improve the noise environment.

Paragraph 1b. Quietest practicable aircraft operations balanced against NO_x and CO₂ emissions

- Noise abatement departure procedures are contained in the International Civil Aviation Organisation guidance in PANS-OPS, Volume 1 to ensure that the necessary safety of flight operations is maintained while minimizing exposure to noise on the ground. These noise abatement departure procedures should not be balanced against potential savings in airlines' fuel costs, which in any event are understood to be marginal, and the consequent effects on NO_x and CO₂. The noise abatement procedures should apply to the initial departure phase of flight out to 20 miles from the airport on the six departure routes. This issue is particularly

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relevant to the current widespread annoyance to residents caused by the airlines having changed the noise abatement departure procedure from NADP1 to NADP2.

- Noise abatement departure procedures have recently been changed by the low cost airlines without notice or consultation with the local communities affected under the noise preferential routes. During the summer of 2009 this has led to a large increase in the number of complaints close to the airport. There should be a specific noise action to resolve this issue.
- The introduction of the Air Asia X A340-300 service to Malaysia in March 2009 has also led to a large increase in the number of complaints from the communities affected under the Clacton departure routes, particularly during the sensitive night period. There should be a specific noise action to resolve this issue.
- The introduction of a tiered fining system for departure noise infringements in 2010 and subsequent reviews is welcomed. Fine levels for both noise and 1000ft height rule infringements at the fixed monitors 6.5km from start of roll should be raised from £500 to £5,000 for each event with monies raised going to the Stansted Community Trust.
- There should be a commitment to use best endeavours to secure a reduction in the noise limits for departing aircraft during the day and at night by 2012. This change is overdue. The noise limits were last reduced in 2000 since when noisy Chapter 2 aircraft have been phased out.
- Fine levels for off-track noise preferential route (NPR) infringements are inadequate to better track keeping and should be raised from £500 to £5,000 for each event with monies raised going to the Stansted Community Trust.
- By 2013, the vectoring height for the two Buzad NPRs should be raised from 3000ft to 4000ft during the day (0600-2330).
- By 2015, the vectoring height for all six NPRs should be raised to 5000ft during the day and night periods.

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- Monitoring of adherence to Standard Instrument Departure routes (SIDs) should be introduced with the objective of requiring airlines to maintain good track keeping. Results should be published on a regular basis.
- Monitoring of adherence to Standard Arrival Routes (STARs) should be introduced with the objective of requiring airlines to maintain good track keeping. Results should be published on a regular basis.
- Continuous Descent Approach (CDA) should be introduced for arrivals to runway 04 as soon as possible and certainly earlier than 2015 as proposed in the NAP. A target date of 2013 should be set and the anticipated noise reduction should be stated.
- The final approach glide slope angle should be increased from 3 degrees to a specified target (e.g. a figure of 3.9 degrees being considered by the aviation industry) with the timescale and anticipated noise reduction stated.
- Monitoring and reporting on aircraft that fly over the St Elizabeth's Centre (Much Hadham), and Bishop's Stortford, Sawbridgeworth and Stansted are welcomed. However airlines should be fined if this noise abatement procedure is infringed without good reason. The fine levels should be the same as for off-track infringements.
- A major omission in the NAP is that there is no attempt to reduce the noise nuisance at night. The current Department for Transport Night Flying Restrictions regime applies until Winter 2011/12. There should be a commitment to use best endeavours to secure the following measures:
 - (i) a total prohibition of movements, except in emergency, between 2330 and 0600 in a phased programme starting in 2012.
 - (ii) an expansion of the core night (night quota) period from 6.5 hours to 8 hours starting in 2012.
 - (iii) a further reduction of the year-by-year total annual quota points starting in 2012.
- There are no actions proposed to reduce exposure levels that can induce harmful effects on human health or adverse effects on cognitive ability and comprehension in schools. This should be addressed.

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- There is no mention of helicopters in the NAP. The END covers helicopter operations and the NAP should include measures to reduce helicopter noise impacts. These measures should include monitoring and fining of track infringements, an increase of height minima outside the airport perimeter especially over populated areas and speed reduction. A reduction in speed of just 10 knots can have a significant noise reduction effect.
- Single engine taxiing should be employed for both departures and arrivals and the resulting ground noise reduction stated.

Paragraph 1c. Effective and credible noise mitigation schemes

- The continuance of home insulation and support schemes is welcomed. However they are existing schemes for properties using Leq noise levels and there are no plans provided to increase the scale of these schemes. The CAA noise maps now show more than double the number of population and households affected by noise using the END Lden noise levels and the schemes should be revised accordingly. There should be further revisions to more adequately reflect the lower average noise levels given in the WHO Guidance for Community Noise.

Paragraph 2. Engage with communities affected by noise impacts to better understand their concerns and priorities, reflecting them as far as possible in airport noise strategies and communication plans

- The community engagement programmes are welcomed; however the annual progress report of the NAP should be more widely published than by just reporting though the airport's Noise and Track Keeping Working Group.
- BAA should publish its complaints handling policy.
- The continuation of recording and investigating all complaints and reporting on a quarterly basis is welcomed. There is a mechanism in place for recording airport-related noise complaints but these are recorded and assessed by the airport operator. This arrangement lacks objectivity and transparency and should be replaced by one which is properly independent, for example, through the appointment of a 'watchdog' for all UK airports. The current system gives rise to considerable mistrust amongst local communities and BAA is encouraged to explicitly state in

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the NAP that it supports the principle of an independent watchdog to monitor the noise (and other environmental impacts) of Stansted Airport.

- The 2009 audit of the BAA Flight Evaluation Unit was undertaken by Uttlesford District Council and consisted of '*the detailed examination of the FEU records for a number of random dates, pre-selected by the audit team to reflect different days of the week, checking details of the aircraft and airport related complaints made on those days, the investigations carried out by the FEU staff, the responses made to the complainants and the recording and classification of the events for reporting purposes to the Noise and Track Keeping Working Group (NTKWG)*'. Uttlesford District Council reported that '*with some of the complaints selected for investigation it was not possible at the time to locate the corresponding response letter.*' It is clear that the audit did not ascertain the accuracy of the complete set of complaints and relevant detailed statistics. Those that were selected for investigation were shown to be incomplete.
- Furthermore, detailed statistics for noise complaints for calendar year 2007 have been shown to be unreliable. Quarterly detailed statistics have not been published for 2008 or for the first two quarters of 2009. The practice of publishing quarterly detailed statistics of noise complaints should be re-established.
- The quarterly detailed statistics for noise complaints should include numbers of complaints, numbers of complainants, numbers of multiple complaints, locations, and complaints associated with the night period.
- BAA should publish the responses to this consultation. This would be expected to form part of the revised plan document

Paragraph 3. Influencing planning policy to minimize the number of noise sensitive properties around the airport

- These initiatives are welcomed; however there are no initiatives to reduce noise or to investigate opportunities to protect quiet areas in general as required by Defra guidance. These points should be added.

Paragraph 4. Organising to manage noise efficiently and effectively

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- These initiatives are welcomed; however these are only internal management measures to manage noise. In themselves they are not actions which would reduce noise.

Paragraph 5. Achieving a full understanding of aircraft noise to inform our priorities, strategies and targets

- These initiatives are welcomed; however they are no more than would be expected. In themselves they are not actions which would reduce noise.

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Q6. How much of the Stansted Airport draft noise action plan have you read or looked at?

Answer: "All of it"

Q7. Which of the following best describes you?

Answer: "Interest or Pressure Group (including local residents association)"

Q8. Have you completed the survey on behalf of your company/organisation or from your own personal point of view?

Answer: "On behalf of my organisation"

Q9. Please complete the following details:

Name	Mr Peter Sanders, Chairman
Organisation	Stop Stansted Expansion
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A list of all individuals and organisations who responded to the consultation will be included in the finalised Noise Action Plan which will be published following the consultation. Please tick this box if you do not wish for your name or organisation name to appear in this list.

Answer: Box left blank

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Your details and responses will only be shared with BAA and will not be passed to any third party. Please tick this box if you do not wish for your details to be passed on to BAA with your responses. GfK NOP will then ensure that your answers are reported anonymously to BAA.

Answer: Box left blank

BAA may wish to contact you to discuss further the issues that you have commented on. Please tick here if you do not wish to be contacted in future by BAA about the matters raised in this consultation.

Answer: Box left blank

Please tick this box if you would like GfK NOP to send you a receipt to acknowledge your survey has been received.

Answer: Box ticked

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