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By email: sou_community@baa.com

Southampton 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

The Southampton Airport draft action plan does not appear to offer a prioritised plan of how to reduce, avoid and prevent environmental noise from aircraft operations, which is the stated aim of the END. Further, we feel that the action plan does omit some recommendations and actions that would add to the current draft plan and benefit the local communities in Southampton and Eastleigh.

(3.A) Night Flights

Environmental Protection UK is happy to see the formal inclusion of the night flying restrictions into the draft noise action plan and feel this is an important measure for the management of the environmental noise-scape in the Southampton-Eastleigh agglomeration.

We do however feel that a commitment should be included within the noise action plan to safeguard the local communities from night flights. We suggest the commitment states that 'BAA Southampton will do all that is possible to ensure that any growth in Air Traffic Movements does not lead to an introduction of night flights at Southampton airport beyond those limited exceptions already in place.' This would be a clear action in the spirit of END that seeks to avoid future noise disturbance.

(3.B) Acoustic Insulation Scheme

The omission of a sound insulation grant scheme (SIGS) from the Southampton Draft Noise Action Plan is unreasonable especially when compared to other airports' action plans. This is especially important when considering the noise action plan identifies seven schools within the 2006 55L_{day} noise contour.

We feel that it would be appropriate to use the action plan as a platform to introduce a SIGS that would benefit the wider community in a prioritised manner and minimise the noise impact of any future growth in Air Traffic Movements. Priority should be given to tackle the issue of these noise-sensitive buildings by offering insulation to the schools on a case-by-case basis, identifying any particularly lightweight buildings that may require wall and ceiling insulation.

The action plan provides an opportunity for Southampton Airport to commit to consulting on and 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.

Further we believe that residential properties should be included within a SIGS at Southampton Airport and that this should again be tackled in a prioritised manner, with progressive steps towards including all residential properties within the 55L_{den} within the scheme. This would have a meaningful impact on the local community and would benefit almost 12,000 people in the long run based upon the noise mapping data provided in the noise action plan.

(3.C) Quiet Areas in Agglomerations and Tranquillity in Rural Areas

Environmental Protection UK welcomes the comments on page 17 of the draft noise action plan to work with local authorities in safeguarding the quiet areas identified in the Southampton-Eastleigh agglomeration. We are also glad to see mention given to the Areas of Outstanding Natural Beauty (AONBs) and National Parks in considering air traffic routing.

As it is likely that quiet areas will be identified after the noise action plan is in effect we feel that the current action plan for 2010-2015 must commit to doing all that is possible to safeguard these areas from exposure to aircraft noise instead of waiting until 2015 to formally include these in the action plan.

Further to this is the protection of the surrounding AONBs and the new South Downs National Park from aircraft noise exposure to and from Southampton Airport. DEFRA guidance states that:

'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.'

Since the publication of the Southampton Noise Action Plan for consultation the Transport Select Committee has expressed its concern over the changing use of airspace over tranquil areas.¹

The action plan should include a commitment to work with Bournemouth Airport, DfT, NATS and the CAA to reduce wherever possible noise disturbance, the frequency of noise events and maintain tranquillity over the AONBs and the New Forest National Park surrounding Southampton Airport. This will of course need to be balanced against undue impact on populations.

(3.D) 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_{den}.

Similarly little attempt seems to have been made to relate the Noise Action Plan (NAP) process clearly to that being followed by NATS in airspace redesign on behalf of CAA, and NAPs provide an opportunity for clarification. An explanation of this process should be included within the noise action plan in the interest of transparency to the general public, and of fulfilling the requirement of the END that noise mapping and action planning be clearly and appropriately communicated to the public (Article 1.b; 8. 7; 9. 1, 2).

(3.E) Noise and Health and Noise Attitude Research

BAA Southampton 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

¹ 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.'

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 their 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.F) Continuous Descent Approach

Environmental Protection UK believes that Continuous Descent Approach procedures should be included in the Noise Action Plan as it is a measure that is used widely at other airports and should lead to real reductions in the environmental noise landscape from airport operations.

As part of providing a transparent noise plan BAA Southampton 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 BAA Southampton are failing to provide a fully transparent noise plan to the general public.

Further to this in the reporting of aircraft achieving CDA, BAA Southampton should state that aircraft that achieve a glide path shallower than 2.5° (unless the aircraft model is 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 aeroplanes approaching much lower than they should or normally would.

(3.G) Noise Acceptability

Finally as BAA Southampton has been made the competent authority in creating the noise action plan for Southampton 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 BAA Southampton should introduce into the Southampton 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 Southampton Airports' noise strategies outlined in the draft noise action plan are targeting the most important problems in relation to aircraft noise?

The Southampton 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.B, 3.C, 3.E and 3.G.

2. To what extent do you think that the draft Southampton Airport 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.C, 3.D, and 3.F, which outline some of the major omissions and issues within the noise action plan.

3. The draft Southampton Airport Noise Action Plan proposes a number of performance indicators to measure progress in implementing the Southampton Airport Noise 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.D, 3.E, 3.F

4. BAA's long-term goal is 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 goal should be for BAA Southampton to be at the forefront of best practice in international airport noise management on sites not running night flights. The long term objective should also contain the desire to 'avoid, reduce and prevent wherever possible the environmental noise impact of the airport operations'

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

Comments on Southampton Airport's draft Noise Action Plan are outlined above.

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

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