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**environmental
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By email: noiseactionplan@bournemouthairport.com

Bournemouth Airport Draft Noise Action Plan 2009: A response from Environmental Protection UK

We are writing in response to your consultation on the draft Noise Action Plan 2009. Environmental Protection UK has considered the consultation document 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

We feel that the Bournemouth Airport Noise Action Plan is generally a solid document that encapsulates the existing noise policies and offers some small pointers to additional work for the future.

However there are some issues that we feel need highlighting for inclusion, that would be beneficial to the noise impact in the local communities now and in the future.

(3.A) Continual 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 welcome Bournemouth Airport's commitment to continue to working with NATS and Southampton Air Traffic Control to optimise the use of CDA. Further we would like to see Bournemouth Airport investigate using a steeper glide path on approach where this is within safe operating procedures for the aircraft using Bournemouth. Using CDA with the steepest glide path that is safe to use could significantly reduce the area affected by environmental noise from airport operations by keeping planes higher for longer.

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

Whilst we are happy to see the inclusion of the night time quota count scheme within the noise action plan it cannot realistically serve as a noise control measure when the current usage as evidenced within the NAP is less than a third of the stated limit. The current QC limit of 3100 per annum would only be a reasonable noise control limit if Bournemouth Airport is expecting to increase night time operations more than three times their current size in the next 5 years.

Whilst we acknowledge that it is expected that all future growth in airport usage can be contained within the current limit, it would be reasonable to set a lower limit i.e. 1000 QC points per annum for the duration of the first action plan whilst committing to the QC limit not growing beyond 3100 QC points in the period of the airport Master Plan. This would constitute a more stringent noise control and would remove the potential for night noise to increase too rapidly.

The World Health Organisation (WHO) has this month (October) published new night noise guidance for Europe. The report recommends guideline levels to protect health. The recommendation is a limit on average annual night noise exposure not exceeding 40dB. Bournemouth Airport should acknowledge these guidelines and aspire to reduce any potential adverse the impact of night noise from airport operations on health of neighbours.

(3.C) Noise Health and Attitude Research

Bournemouth Airport should recommend within their action plan that further research be carried out by DfT/DEFRA into the affects 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, and also fulfil the END requirement of communication and public engagement in the process.

(3.D) Acoustic Insulation Scheme

Due to the nature of the noise maps for Bournemouth we recognise that it is not required for Bournemouth Airport to provide insulation to residential or noise sensitive building. However, we believe that the Noise Action Plan should provide a commitment to provide a Sound Insulation Grant Scheme in line with those in other airports if the projected growth in air traffic movements leads to significant increases in noise levels and high levels of noise within the communities around the airport.

Alternatively, Bournemouth Airport may consider committing to a wider area overtime. As relatively few properties are currently within the 55 L_{den} Bournemouth Airport has an opportunity to take advantage of this in mitigating their noise impact and should use a phased program to offer insulation to everyone within the 55 L_{den} contour. Performing such an undertaking would be in the spirit of END, as this measure would go beyond what is required by law to avoid, prevent and reduce environmental noise from airport operations. Undertaking this action would also give Bournemouth Airport a chance to prioritise their targeting of noise measures to those most exposed to aircraft noise in the local communities.

With regard to environmental noise from aircraft operations at schools, the action plan provides an opportunity for Bournemouth Airport 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.E) 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 NAPs process clearly to that being followed by NATS in airspace redesign on behalf of CAA, and NAPs provide an opportunity for clarification

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

Environmental Protection UK welcomes the inclusion of considerations for quiet areas in the Bournemouth agglomeration as well as the issue of over flight at the New Forest National Park. We hope that these investigations are undertaken earnestly to improve the noise-scape in the surrounding areas and that the findings of these investigations be published for the public to understand any decisions that may be taken.

END calls for consideration to be given to environmental noise in quiet areas in open country also, 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 areas¹

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 Bournemouth and any AONBs and National Parks that may be affected by over flight from Manchester International's airport operations. This will of course need to be balanced against undue impacts on populations.

(3.G) Noise Acceptability

Finally as Bournemouth Airport has been made the competent authority in creating the noise action plan for Bournemouth Airport 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 Bournemouth Airport should introduce into the Bournemouth Airport Noise Action Plan a recommendation that the government provide meaningful guidance on acceptable noise levels.

4. Consultation Questions

1. Do you think this draft plan sets out a suitable regime for the ongoing management of noise from aircraft arriving at or departing from the Airport?

Due to the mix of noise controls in place at Bournemouth it is hard to see that any prioritisation of the measures is needed and as little can realistically be done beyond providing an acoustic insulation scheme to those within the current noise contours, it would appear that enough is being done to avoid, prevent and where possible reduce environmental noise at Bournemouth Airport. Our two key considerations that mean the action plan is not totally suitable refer to the Night Noise Quota Count (3.B) and a possible Sound Insulation Grant Scheme (3.D).

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.'

2. Are there any further noise management features that you feel might be introduced, bearing in mind the requirements to ensure the safe operation of the Airport and aircraft and the need to limit or reduce the disturbance to populated areas?

We believe that there is potential for introducing a phased and targeted acoustic insulation scheme that would help to mitigate the noise impact of current airport operations and future growth in operations at Bournemouth. Introducing such a scheme would offer significant benefits to the surrounding communities.

Certainly we feel the action plan needs to acknowledge that there may be a need for this scheme in the future due to significant increases in environmental noise that would come with significant growth in air traffic movements at Bournemouth Airport.

3. Do you have any further comments on the draft noise action plan?

Please refer to Section 3 The Overview of our consultation response for all other comments on the draft noise action plan.

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

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