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**environmental  
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## **East Midlands Airport Draft Noise Action Plan July 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**

Overall we feel that the action plan is a solid document that falls short of some of the intentions of END. The NAP fails to effectively prioritise its measures to avoid, prevent and reduce noise although there is prioritisation with regards to

the insulation schemes, which is welcome. We feel that due to the more rural location of the airport the NAP avoids some of the issues that it could reasonably consider. This is particularly the case where quiet areas in first round agglomerations are concerned, because although these do not fall within the noise maps it is still possible for them to be considered within the NAP and in the creation of noise preferential routes.

### **(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 and the target of 80% of arrivals achieving CDA. However little explanation of the CDA procedure is given within the action plan.

We feel it would be prudent to include more literature within the action plan, with Continuous Descent Approach falling under its own heading, that will describe how CDA is achieved, the benefits of CDA and how it will be measured and monitored at EMA.

As part of providing a transparent noise plan East Midlands Airport Ltd 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° nor does the action plan state what glide path East Midlands Airport Ltd considers 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.

East Midlands Airport Ltd should also investigate using a steeper glide path where this is within safe operating procedures for the aircraft using EMA.

### **(3.B) Night Noise**

Environmental Protection UK welcomes the inclusion of East Midlands Airport Ltd's Night Noise policies. We are particularly pleased to see the inclusion of an economic sanction on planes operating at night as a means to discourage noisier aircraft operating at night. Further we welcome the target of all night flights being operated by Chapter 4 aircraft by 2012. With the inclusion of this target we believe that the main check on night noise used at EMA, the night noise contour (57dB<sub>LAQE,8H</sub>) limit of 14.6km<sup>2</sup> by 2016 should be tightened.

By using a quieter fleet for night operations it will be possible for more air traffic movements to occur to create the same average noise. This therefore means that tightening the noise contour limit would serve as a check on the number of noise events that would occur at night under the current targets, which is important given the evidence pointed in recent research i.e. the ANASE report, to the number of noise events being a factor in causing people to be 'annoyed' by aircraft noise.

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. East Midlands Airport Plc should acknowledge these guidelines and aspire to reduce any potential adverse impacts of night noise from airport operations on the health of neighbours.

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

East Midlands Airport should seek to 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**

Environmental Protection UK welcomes the inclusion of the various sound insulation grant schemes within the action plan. We welcome the inclusion of a SIGS scheme for community buildings. We feel that East Midlands Airport Ltd should state all types of buildings they plan to offer this scheme to. We feel that many types of community buildings, beyond schools and hospices, should be eligible for acoustic insulation on this scheme - particularly places of worship, libraries and village halls.

With regard to environmental noise from aircraft operations at schools, the action plan provides an opportunity for East Midlands Airport Ltd 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 on these routes may increase in the future to levels that might merit the consideration of providing respite periods; or limiting growth in air traffic movements along these routes may be considered in future, where, for example high noise exposure i.e. 70dB L<sub>den</sub> is experienced.

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**

Although the action plan states that the noise map does not affect any first round agglomeration it is our view that East Midlands Airport Ltd should consult with the relevant local first round agglomerations, NATS and CAA to avoid where possible over flight, in general, of any quiet areas that are identified as a means to reduce as far as possible disturbance in these areas.

The action plan recognises the need to avoid over flight of AONBs and National Parks below 7000 feet and acknowledges that this, in general, does not occur as result of EMA operations. However END calls for consideration to be given to environmental noise in quiet areas in open country within the noise action plan for the airport. 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 areas<sup>1</sup>

The action plan should contain a commitment to work with DfT, NATS and the CAA to reduce noise disturbance, the frequency of noise events and maintain tranquillity as far as reasonably possible over the open country surrounding EMA. This should be possible with the use of specially crafted Noise Preferential Routes to minimise the area impacted by noise events.

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

Finally as East Midlands Airport Ltd has been made the competent authority in creating the noise action plan for East Midlands 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 East Midlands Airport Ltd should introduce into the EMA Noise Action Plan a recommendation

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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.' |

that the government provide them with meaningful guidance on acceptable noise levels.

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

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