



Environmental Protection UK,  
44 Grand Parade,  
Brighton,  
BN2 9QA

**environmental** 14 January 2010  
**protection uk**

By email: [Kellie.Heath@londoncityairport.com](mailto:Kellie.Heath@londoncityairport.com)

## **London City 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 London City Airport (LCA).

There is no financial information provided detailing the costs etc. associated with the noise control measures contained within the Noise Action Plan. This is an element that is required by END to be included within the NAP and must therefore be included before the Secretary for State can formally introduce the NAP.

The conclusion to the LCA draft NAP states that “assessment has found that the environmental noise impact of existing operations at the airport, based on both the 2006 noise contours and the proposed increase in aircraft movements to 120,000, subject to the implementation of the measures described in Section 5.4 of the Noise Action Plan, are acceptable.” This seems to be categorically opposed to the intentions of END when considering that the measures described in Section 5.4 have no measurable or quantifiable impacts that seek to avoid, prevent or reduce on a prioritised basis environmental noise.

#### **Noise Health Research and Attitude Survey**

London City 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 also serve to foster better community engagement as well as inform the NAP process, and fulfil the END requirement of communication and public engagement in the process.

#### **Noise Preferential Routes (NPRs)**

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 NAPs process clearly to that being followed by NATS in airspace redesign on behalf of CAA, and NAPs provide an opportunity for clarification

## **Sound Insulation Grant Scheme (SIGS)**

Environmental Protection UK welcomes the formal inclusion of LCA's Sound Insulation Scheme in the NAP. We recognise that the scheme offered by London City goes beyond that required in the Air Transport White Paper and offered by other UK airports. We do however feel that consideration should be given to changes in the Sound Insulation Scheme that may not be immediately pertinent. Firstly we feel that London City Airport needs to consider on a 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 may remain for many years). Secondly provisions should be made to include ventilation, preferably passive ventilation, to go in alongside the insulation to take account of the effect of insulation.

With regard to environmental noise from airport operations at schools the action plan provides an opportunity for London City 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.

## **Quiet Areas in Agglomerations and Tranquillity in Rural Areas**

Environmental Protection UK is pleased to see that LCA intends to "assess whether there are any quiet areas relevant to the airport and meet with the appropriate authorities to discuss any necessary measures."

We would like to see LCA looking to work with CAA and other relevant organisations to minimise the impact that aircraft movements to and from the airport may have on 'quiet areas' beyond the immediately surrounding communities (i.e. beyond the 55Lden). Indeed the Transport Select Committee has recently stated its concern over the changing use of airspace over tranquil areas<sup>1</sup>

To this end we would like to see within the action plan a commitment 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 areas and any AONBs and National Parks that may be affected by over flight from London City Airport's operations this will of course need to be balanced against undue impacts on populations.

---

<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.'

## **Noise acceptability**

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

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

Mary Stevens, Policy Officer - 01273 878781  
mary.stevens@environmental-protection.org.uk

Josh Brophy, Policy Volunteer – 01273 878773  
josh.brophy@environmental-protection.org.uk

<http://www.environmental-protection.org.uk>

December 2009