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By email: noise@ltn.aero

London Luton 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

(3.A) Night Noise Policy

The night noise policy that is referred to in actions 15 and 19 does not appear in the Noise Action Plan and no link appears to be provided to the NAP. As part of providing a clear and transparent Noise Action Plan it would make sense to include a description of the measure and controls that are in place as a result of the night noise policy.

As the policy is updated annually this should be included in the description and information on accessing the most up to date policy should be provided

(3.B) Noise Health Research and Attitude Survey

LLAOL 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.

(3.C) Sound Insulation Grant Scheme (SIGS)

We are pleased to see that LLAOL intends to address the issue of non-residential noise sensitive buildings being exposed to environmental noise from airport operations. However, we feel that the scheme should be expanded to include other community buildings such as places of worship, libraries etc. This would have real and meaningful benefits to many in the communities around Luton Airport. In expanding the scheme LAAOL would be able to prioritise what it feels are the more 'needy' buildings for insulation and could introduce insulation in a phased process.

When developing the insulation scheme for non-residential noise sensitive buildings LLAOL should be aware of a number of issues. The LLAOL should 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 years). Further provisions should be made to include ventilation (air conditioning or other) to go in alongside the insulation to take account of the affect of insulation on the room temperature.

With regard to environmental noise from aircraft operations at schools the action plan provides an opportunity for LLAOL 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.

Due to the nature of the noise maps for London Luton Airport we recognise that it is not required for LLAOL to provide insulation to residential properties. However, we believe that the Noise Action Plan provides the perfect opportunity to address acoustic insulation for the local affected communities and should include a commitment to provide a Sound Insulation Grant Scheme to a wider area, than currently required by law, overtime.

As relatively few properties are currently within the 55 L_{den} LLAOL has an opportunity to take advantage of this in mitigating their noise impact and should use a phased program to offer insulation initially to those most heavily affected by environmental noise as a priority. 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. Introducing this action into the NAP would also give London Luton Airport a chance to prioritise their targeting of noise measures to those most exposed to aircraft noise in the local communities.

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

(3.E) Noise Monitoring

We are pleased to see that London Luton Airport Operations Ltd intends to extend its noise-monitoring scheme in order to understand the noise impact and exposure to those that live further from the airport than its immediate vicinity.

(3.F) Continuous Descent Approach

Environmental Protection UK welcomes the inclusion of CDA procedures for arriving aircraft, where this is in accordance with safe operating procedure, as stated in action number 4.

However, the Noise Action Plan provides no description of the process behind CDA and the benefits that can arise from its use nor is this information linked to. The action plan should provide a clear explanation of CDA procedures and the typical costs and benefits associated with its use. The action plan should also provide an explanation of the specific process for achieving CDA at London Luton Airport i.e. approach angle, distance to begin approach etc.

As part of providing a transparent noise plan and evaluating the implementation of CDA, LLAOL 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 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.

LLAOL should also investigate using a steeper glide path where this is within safe operating procedures for the aircraft using London Luton Airport.

(3.G) Tranquillity in Rural Areas

As stated in the Noise Action Plan END calls for consideration to be given to environmental noise in quiet areas in open country, which has been further highlighted by the Transport Select Committee's concerns over the changing use of airspace over tranquil areas¹

Further to this is the protection of AONBs and National Parks from aircraft noise exposure to and from Manchester. 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.'

Environmental Protection UK welcomes the inclusion of a commitment from London Luton Airport to work with the relevant organisations, namely NATS, to reduce noise disturbance, the frequency of noise events and maintain tranquillity over the rural communities surrounding Luton and any AONBs and National Parks that may be affected by over flight from London Luton's airport operations. This will of course need to be balanced against undue impacts on populations.

(3.H) Noise Acceptability

Finally as LLAOL has been made the competent authority in creating the noise action plan for London Luton 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 LLAOL should introduce into

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.'

the London Luton Noise Action Plan a recommendation that the government provide meaningful guidance on acceptable noise levels.

4. Consultation Questions

1. What do you consider to be the most important problems relating to aircraft noise at London Luton Airport?

Please refer to comments in Section 3, which we feel covers the most important problems relating to aircraft noise at London Luton Airport

2. To what extent do you think that this Draft Noise Action Plan will help to further enhance London Luton Airport's noise management strategy? (1-5)

We feel that this Draft Noise Action Plan could potentially enhance London Luton Airport's noise management strategy by providing a platform to build on the current measures and by providing a comprehensive document of all the noise control measures in place at London Luton Airport, however a number of major omissions are present in the NAP that do nothing to enhance the noise management strategy, namely CDA procedures are not described the Night Noise policy should warrant a much larger mention in the NAP and indeed much of it should realistically be present in a 'Noise Action Plan'. Also the omissions of a number of the requirements of END, as discussed in question 4, mean that this draft proposal cannot be considered as enhancing London Luton Airport's noise strategy

3. Are there any additional actions that you think we should be taking to control the noise impact from aircraft departing from or arriving at London Luton Airport?

Please refer to sections 3.C, 3.D, 3.F, and 3.G for our views on additional actions that should be taken. Namely we believe there is the opportunity for residential insulation to be introduced and recommendations for measures to be included in the proposed 'noise-sensitive' buildings insulation scheme as well as considering a steeper glide path for CDA at Luton where this is within safe operating procedures for the aircraft operating a London Luton.

4. Do you believe that this Draft Noise Action Plan meets the requirements of the Guidance? (1-5)

We feel that the Draft Noise Action Plan does not meet the requirements of the guidance for a number of reasons. Firstly there is no section detailing the financial aspect of the noise control measures in place, or predictions for those that will be introduced. This includes simple costs and expenditure figures, cost-benefit analysis or cost effectiveness analysis. Secondly there is no mention of the evaluation of the noise action plan and how the impact will be measures, as this is another requirement of END it is clear that the guidance is not being adhered to fully. Finally the action plan fails to make any predictions regarding the reduction of the number of people affected by environmental noise from London Luton's airport operations

5. Do you have any other comments on the London Luton Airport Draft Noise Action Plan?

Please refer to Section 3 The Overview for all our comments on the London Luton Airport Draft Noise Action Plan

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

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