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**environmental
protection uk** 20 October 2009

By email: noiseactionplan@manairport.co.uk

Manchester International Airport Draft Noise Action Plan 2008-2013: A response from Environmental Protection UK

We are writing in response to your consultation on the new draft Noise Action Plan 2008-2013. 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

We feel that the Manchester International 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 we have highlighted

issues that we feel need highlighting for inclusion, where further measures would strengthen the noise action plan.

(3.A) Night Noise and Quota Count

The night time quota count scheme operated at Manchester is a welcome inclusion to the noise action plan. We are happy to see that the QC night at Manchester International Airport matches up with the recognised 8-hour END night running from 23:00 – 07:00, and this is welcomed, as this is contrary to most of the other QC schemes in operation at British airports.

As the current Night Noise Policy ends in 2011 we welcome the intention to readdress the issue of underutilisation of QC points and also underutilisation of movement limits and feel that this will be a key move on the airport's part in seeking to avoid, reduce and prevent environmental noise from their operations.

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. Manchester International 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.B) Noise Health Research and Attitude Survey

Manchester International Airport Plc 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)

Environmental Protection UK welcomes the inclusion of Manchester's SIGS into the noise action plan, however, it is clear that this scheme is one that has already been in place for some years. We feel it would be appropriate to use the action plan as means to improving upon the current insulation scheme and to make commitments that would benefit the wider community. We believe community buildings, such as libraries and places of worship, should be considered for inclusion within the 'noise-sensitive' building category at Manchester. This would have real and meaningful benefits to many in the communities around Manchester. Furthermore insulation packages should be made available to homes that have not received insulation grants within the last 20 years.

Manchester International Airport Plc should also consider on 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 Manchester International Airport Plc 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.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 Manchester International Airport Plc 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 part of providing a transparent noise plan Manchester International Airport Plc 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 typically achieved using a glide path of 3°, nor does the action plan state what glide path Manchester International Airport 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.

Manchester International Airport Plc should also investigate using a steeper glide path where this is within safe operating procedures for the aircraft using Manchester International Airport.

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

The action plan does not commit to honouring quiet areas in agglomerations retrospectively. As it is likely that these quiet areas will be identified after the noise action plan is in effect, the action plan must contain a commitment that the Airport Company will do all that is reasonably possible to safeguard these quiet areas from exposure to environmental and aircraft noise due to the operations of Manchester International Airport.

Similarly END calls for consideration to be given to environmental noise in quiet areas in open country, however, no consideration is given to this within the noise action plan for the airport. 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

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.'

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 Manchester 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.

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.'

(3.H) Noise Acceptability

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

4. Consultation Questions

1. Are there any further actions that we should be taking to control the noise impact in areas shown to be affected by high levels of noise? High noise levels are those within the 69 dB LA_{eq} contour.

Please refer to section 3.D of our consultation response for views on extending the Sound Insulation Grant Scheme

2. Are there any further actions that we should be taking to control the noise impact from departing or arriving aircraft?

Please refer to sections 3.A, 3C, 3.D, 3.F and 3.G of our consultation response for views on the noise impact of aircraft operating to and from Manchester International Airport. We feel that Manchester Airport Plc has a large number of actions that seek to control the noise impact of aircraft operations but feel that full consideration has not necessarily been given to each facet of this and the sections highlighted outline our thoughts on how to improve on the noise action plan

3. Do you think that this Draft Noise Action Plan provides a suitable framework for the ongoing management of aircraft noise?

The Draft Noise Action Plan is certainly the most suitable framework for the ongoing management of aircraft noise that has been published to date. It is difficult to see any major omissions and the document does offer some small pointers to additional work in the future.

4. Do you have any other comments or suggestions on this Draft Noise Action Plan?

Our comments and suggestions for the Draft Noise Action Plan are outlined in Section 3 The Overview of this response.

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

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October 2009