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**environmental  
protection uk** 21 October 2009

By email: [noise@newcastleinternational.co.uk](mailto:noise@newcastleinternational.co.uk)

## **Newcastle International 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 noise action plan falls short of the intentions of END. There is no prioritisation of actions to avoid, prevent or reduce on a prioritised basis the harmful affects of environmental noise. Whilst we acknowledge that the

noise impact of the airport does not affect a heavily populated area the noise action plan provides an opportunity for the airport to engage with the local communities and attempt to address in a prioritised manner the noise impacts.

An explanation of the noise mapping and action planning process should be included within the noise action plan in the interest of transparency to the general public, and of fulfilling the requirement of the END that noise mapping and action planning be clearly and appropriately communicated to the public (Article 1.b; 8. 7; 9. 1, 2).

### **(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. 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 Newcastle International.

As part of providing a transparent noise plan NIAL 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 Newcastle International Airport considers as having achieved CDA.

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

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

Page 9 of the action plan states, "there are currently no controls in place in terms of aircraft movement". The action plan provides an opportunity for NIAL to engage with the community and enact new measures to avoid, prevent and reduce environmental noise from airport operations. The issue of night noise has this month (October) been highlighted by the WHO's publication of night noise guidance for Europe. The report recommends guideline levels to protect health of a limit on average annual night noise exposure not exceeding 40dB. Newcastle International Airport Ltd should acknowledge these guidelines and aspire to reduce any potential adverse the impact of night noise from airport operations on health of neighbours.

With this in mind we believe NIAL should look into implementing a Quota Count Scheme similar to those operated at other airports, along with the bans on noisier

aircraft operating at night that normally goes along with this, and a cap on night movements to ensure that the airport's neighbours are able to get a 'good nights' sleep'.

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

NIAL 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) Sound Insulation Grant Scheme**

Due to the nature of the noise maps for Newcastle we recognise that it is not required for Newcastle International 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, NIAL may consider committing to a wider area over time. As relatively few properties are currently within the 55  $L_{den}$  NIAL 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 NIAL a chance to prioritise their targeting of noise measures to those most exposed to aircraft noise in the local communities.

### **(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  $L_{den}$  is experienced.

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

The action plan makes no commitment to having any regard to protection of 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 commit to doing all that is possible to safeguard these areas from exposure to aircraft noise events.

Further to this is the protection of the surrounding AONBs and National Parks from exposure to noise from flights to and from NIAL. 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.'*

Similarly END calls for consideration to be given to environmental noise in quiet areas in open country. No consideration is given to this within the draft 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 areas<sup>1</sup>

The action plan should contain a commitment to work with DfT, Air Traffic Services and the CAA to reduce noise disturbance, the frequency of noise events and maintain tranquillity over the AONBs and any National Parks that may be affected by Newcastle Airport's operations.

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

Finally as NIAL has been made the competent authority in creating the noise action plan for Newcastle International 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 NIAL should introduce into the Newcastle International Noise Action Plan a recommendation 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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<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.' |

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