

Airports Commission Discussion Paper 05

Aviation Noise –

a response by Birmingham Airport



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1 Executive Summary

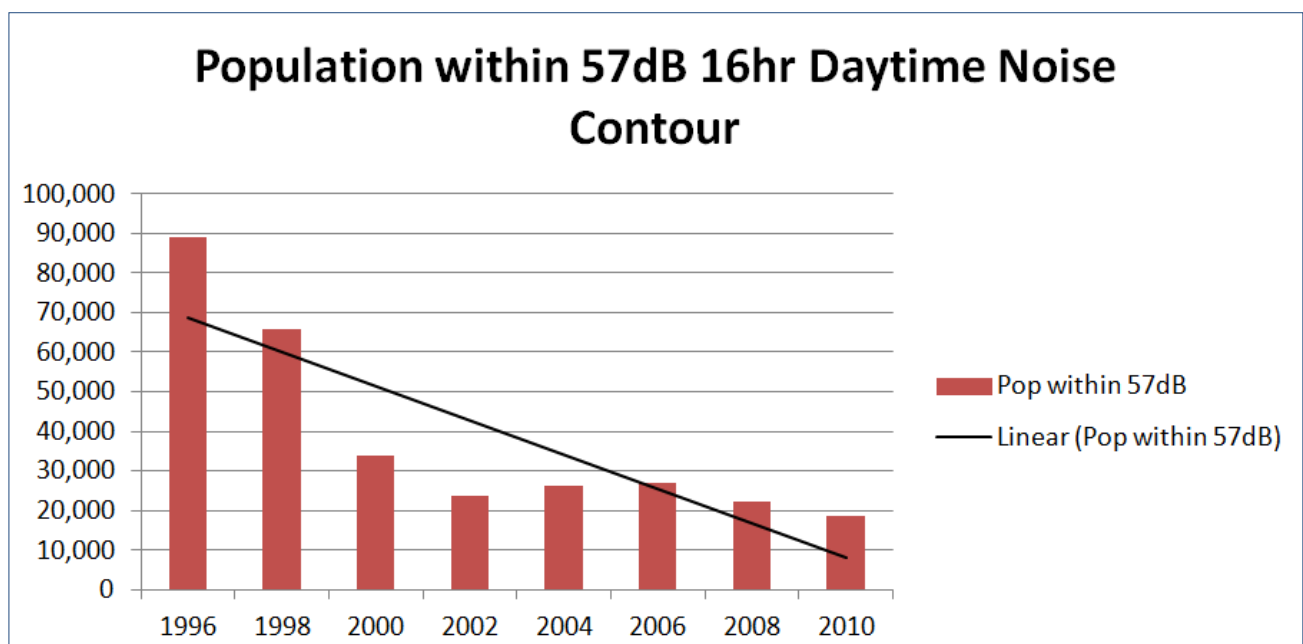
Birmingham Airport welcomes the inclusion of aviation noise in the Airports Commission considerations for assessing the need for additional UK airport capacity and how this can be met in the short, medium and long term.

Birmingham Airport has a strong track record in noise management; our objective is ‘to work with our stakeholders, including the local community and industry partners, to adopt the best practicable means to assess, manage and minimise the impact of aircraft noise both now and in the future’.

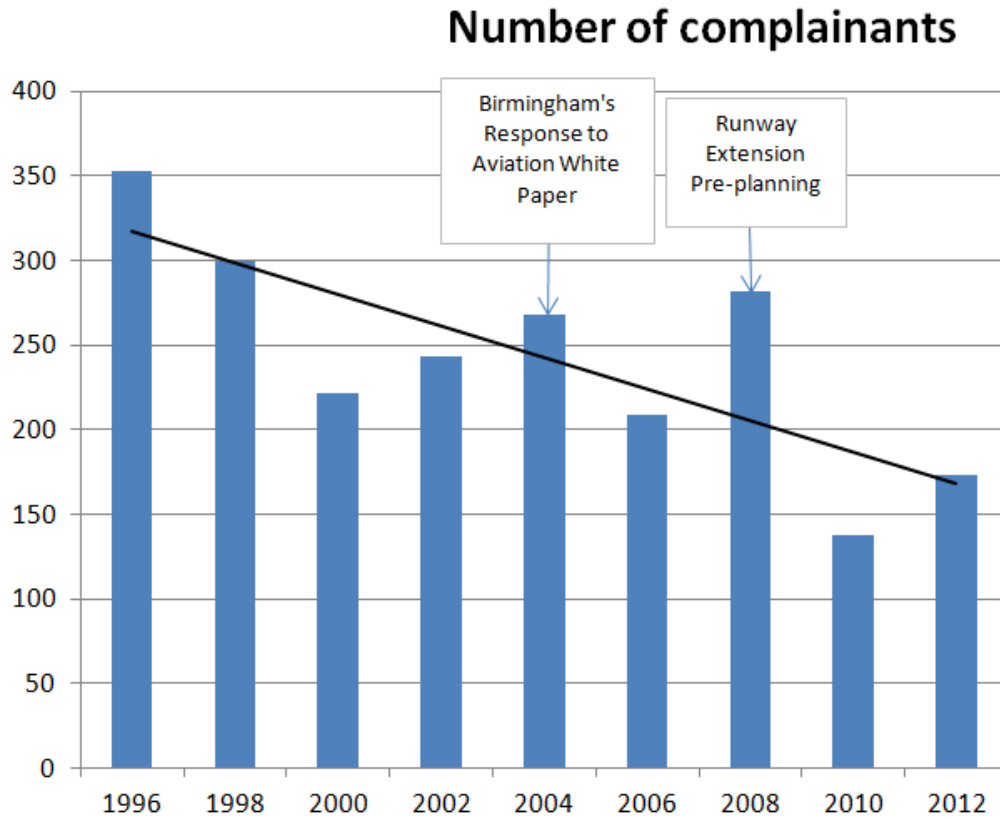
The noise climate around Birmingham Airport has significantly improved over the years, with the latest noise contours (2010) showing the lowest noise impact since records at Birmingham began (in 1993). This is largely due to the improvements in aircraft technology as well as the local measures undertaken to reduce the noise impact.

It should be recognised that the Airport serves the UK’s Second City – so it is hardly surprising that due to the high population density, the number of people impacted ranks high relative to some rural airports. However, Birmingham’s impact is still significantly lower than Heathrow, which has the worse noise impact of any European Airport.

Some visions submitted to the Airports Commission would appear to imply that the noise environment around Heathrow would degrade significantly, were additional runway growth to occur. Birmingham’s vision is unusual in that it appears to have a net benefit for the wider community – which includes ‘respite periods’ and an elimination of significant night noise exposure for the majority of the local population.



Coincident with the improvement in the noise climate, Birmingham Airport has experienced a trend of decline in the number of people complaining about aircraft noise - despite the general acknowledgement that people living around Airports are becoming more sensitive to noise.



There was an increase in correspondents during 2004/2005 following the Airport's response to the Government White Paper of 2003, which included proposals for a second runway. We also saw an increase in correspondents in the year 2008/2009 to coincide with the Airport's consultation for the runway extension. Part of this was due to 'organised campaigns' (see below).

The best way to tackle noise is at a local level. Noise only lends itself well to government intervention if an airport is unable to balance its needs with the demands of local stakeholders in a manner which is satisfactory to all involved.

Birmingham Airport's approach to the issue of noise, taking account of future potential, is 'two pronged':

- In the short to medium term we consider that the increased use of our existing runway, aided and assisted by the recognition of proposals we made in response to the commission submitted in May¹, should be combined with our existing noise abatement and management schemes. These measures include one of the most stringent night noise policies of any UK airport. A combination of best practice in community relations, a generous sound insulation grant scheme and pioneering airfield management systems will allow the Airport to continue to grow sustainably.
- In the long term we consider that the location of our innovative vision for new capacity, (submitted to the Commission in July²) to link into the proposed Birmingham Interchange HS2 station to the east of the Airport, allows for significant reductions in the numbers of people affected by night noise. We would move night time operations from the existing runway to the 'vision' runway.

¹ <http://www.balancedaviationdebate.com/pdf/Birmingham%20Airport%20submission.pdf>

² <http://www.balancedaviationdebate.com/pdf/Birmingham-Airport-public-hr.pdf>

2 What is the most appropriate methodology to assess and compare different airport noise footprints?

Birmingham Airport supports the Government's objective to limit, and where possible, reduce the number of people in the UK significantly affected by aircraft noise. We acknowledge that any further development at Heathrow would significantly undermine that objective.

Birmingham Airport supports the retention of the 57dB(A) LAeq noise contour as a metric of measuring the noise impact of Airports. The Airport's Short and Medium Term response to the Airport's commission provided details of the numbers of people likely to be exposed by noise (57 dB(A) in 2030. This figure was 55,150; however, this was considered a worst case scenario as the predictions dated from 2007 with an old aircraft fleet mix. Despite this being a very worst case scenario, by comparison the number of people affected at Heathrow now is 256,500.

Therefore Birmingham Airport can take some of this traffic (and future growth) - without increasing the number of people affected by noise to anything close to what is experienced today at London Heathrow.

In terms of differing metrics and 'scorecards', Birmingham Airport believes the term 'noise efficiency' is misleading for Airports with existing capacity. Firstly, this concept suggests that airports with a high noise efficiency score are more efficient than other airports, e.g. in some kind of noise management or operational manner. However what the term actually describes is 'accidents of geography'. Most airports are in their locations for historical reasons (for instance, former RAF bases). Noise sensitive development has often been allowed to grow around them through no particular fault of the airports themselves. This has been the case at Birmingham.

Noise policy and the consideration of impacts should not only be about the absolute number of people affected. Policies should ensure that the numbers of people that are affected are engaged with, and their problems addressed, in a way that balances the economic benefit delivered by aviation with the environmental cost of the industry. One way that Birmingham achieves this is by sharing the benefits of aviation with local communities through employment. Birmingham Airport is situated amidst communities suffering acute levels of deprivation and we recognise that the provision of a wide range of full and part-time employment opportunities can make a significant contribution to tackling some of these issues. To aid in these communities accessing the airport we provide significant financial contributions to bus services to support employees (and passengers) living in these areas.

A key priority for Birmingham Airport is to ensure the interests of the local community are adequately represented by airport policy. We have invested heavily in community engagement and liaison, in particular around noise issues. Communication and engagement is key to a successful noise management programme.

3 To what extent is it appropriate to use multiple metrics, and would there be any issues of contradiction if this were to occur?

Birmingham Airport would caution the use of multiple metrics. Whilst all metrics are open to criticism, we feel the introduction of multiple metrics could add further confusion. This was our experience following the introduction of the Lden metric which introduced confusion with the traditional LAeq metric with local residents.

Birmingham Airport supports the retention of the 57dB(A) LAeq noise contour as a metric of measuring the noise impact of Airports. The use of the 57dB(A) contour has been built up following years of research and its use has been tested via (the now superseded, but still useful) PPG24 at numerous high profile planning inquiries and appeals.

That said, despite our views on multiple metrics, N70 noise contours do appear useful at first glance. However, the result of using N70 contours would presumably be to distribute flights 'over the ground', so as to bring the higher N70 contours down. This has the effect of affecting more people at a lesser level, but current Government/CAA guidance is to affect as few people as possible. Technological improvements in track keeping (R-NAV) concentrate this affect. We therefore suggest the Commission/Government need to take a considered view on what is the best method – carry on as now e.g. impact as few people as possible (but those that are affected will become more so over time)– or consider the Australian approach, and spread the noise impact around.

Birmingham Airport agrees that noise information can be improved across the industry and does not believe that noise contours, alone are the best way to present noise information and to communicate noise impacts to local residents.

Acknowledging our impacts, Birmingham Airport has itself developed a number of tools and practices to communicate noise information proactively. For example:-

- The development of a positive working relationship with the Airport Consultative Committee, and the Environmental Monitoring Working Group. Care is taken to ensure that when communicating we are clear, professional, open and transparent.
- The education of key members of local communities so that they gain a thorough understanding of our policies, procedures and our Aircraft Noise and Operations Monitoring System (ANOMS) enabling them to communicate this information to their local communities on our behalf.
- A Community Alert System, which provides key community contacts with details of any planned unusual activity which may affect their area. This promotes trust in the Airport's commitment to providing an open, transparent and informative service. Notifications are sent by SMS, email, by telephone or in writing, as appropriate to the situation and available timescale.

- A scheduled Community Outreach programme, where representatives from the Environment and Community teams run drop-in sessions in local communities to answer any questions and concerns residents may have.

- The use of Google Earth to show key environmental information such as typical flight tracks, the boundary of our sound insulation scheme, or the location of engine ground running activity. This allows individuals to gain a better understanding of how Airport activities could impact on their specific area. It is particularly useful for people looking to relocate close to the Airport.



<http://www.birminghamairport.co.uk/meta/about-us/environment/environment-on-google-earth.aspx>

- Conducting a number of noise studies using our portable noise monitor. We will respond to requests for noise studies and after collecting data a full noise report is generated and its finding presented to the community.

- In 2013 we introduced a specific community twitter account, we use this to direct important messages to the community specifically related to community & environmental issues only

bhx_community



- We believe in continuous improvement, and a review of 'best practice', led by the Independent Chair of the ACC, in collaboration with the Department for Transport, is under way. This is expected to result in the implementation of an even more inclusive structure and programme during 2014.

- 4 Are there additional relevant metrics to those discussed in Chapter 3 which the Commission should be aware of?

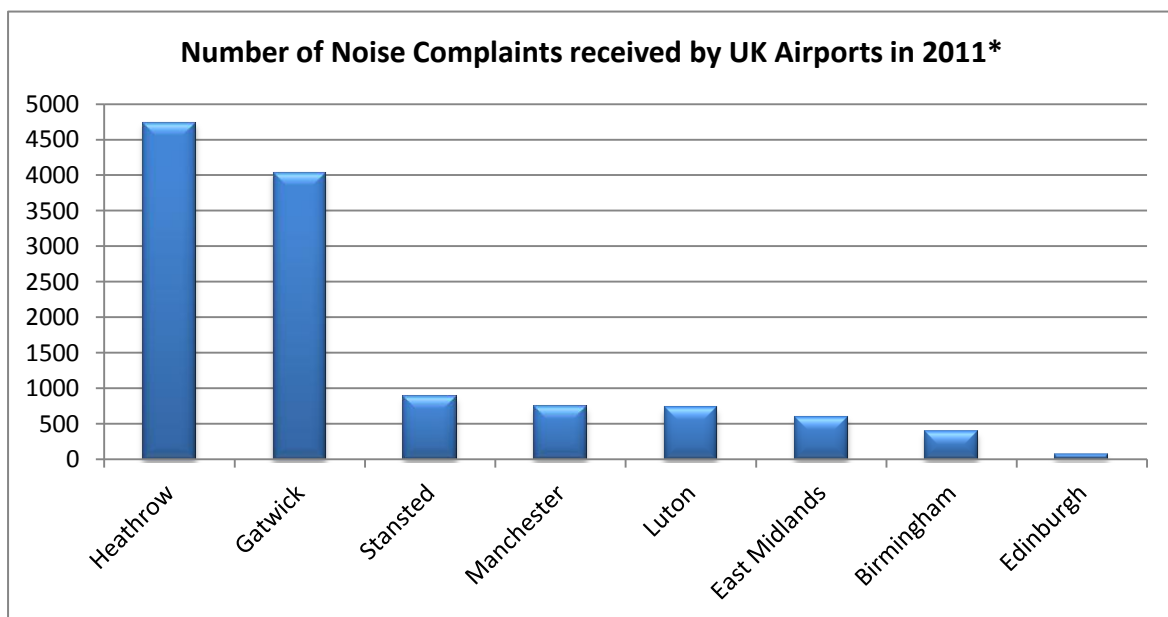
Community Relations & Complaints Management

Whilst not a specific metric, we believe that consideration should be given to community relations. The monitoring of the levels of noise complaints at UK Airports should be considered as a way of assessing the acceptability of the Airport in terms of community mitigation and engagement.

Monitoring complaints as a measure of annoyance is useful but safeguards need to be put in place to ensure that this is truly representative. This philosophy also applies to membership of, and representation at, Airport Consultative Committees.

Continually-improving stakeholder-management will seek to be more inclusive and representative – and (whilst voices must be heard) will mitigate the impacts of organised complaints and lobbying from a relative minority of ‘special interest’ groups.

Acknowledging that Birmingham – the UK’s ‘Second City’- has the third largest noise impact in the UK (in terms of people within the 57dB(A)), Birmingham Airport is at the forefront of best practice in this area. Conventional thinking suggests that this would be reflected by the number of noise complaints received, where it would not be unreasonable to expect to see a correlation between number of people affected by noise and the total number of noise complaints. However, Birmingham Airport receives some of the lowest numbers of noise complaints in the UK, largely because we have developed a strong community engagement programme and continue to build upon good relationships within our local stakeholders.



**Year 2011 has been chosen specifically due to 2012 being an unusual year for noise complaints for Heathrow Airport (due to Operational Freedoms trial).*

We recognise that noise continues to be the greatest environmental concern for nearby communities. Despite our relative noise impact, we have developed a strong community engagement programme, have built good relationships within our local communities, and we will continue to improve.

Community complaints are not only logged and investigated, the resulting information is actively analysed. Detailed complaint analysis allows us to identify trends, better understand community concerns and thereby develop practical measures that, where possible, mitigate noise and reduce concerns.

Birmingham Airport is aware of the fact that many community complaints come from areas outside of the LAeq 57dB(A) contour (the level the Government states is the approximate onset of significant community annoyance). Approximately 90% of community concerns at Birmingham Airport in 2010 were received from areas outside this contour area. In recognition of this the Airport's community work (Outreach surgeries, Trust Fund qualification etc) extends along our flight paths and is not simply restricted to the area covered by the 57db contour.

Night Noise

Birmingham Airport recognises that night flights are important to both passengers and the economy of the UK. However, our experience of night noise, from a community relations perspective, is that night noise is particularly annoying to people and is one of the least acceptable aspect of aircraft operations. Birmingham Airport considers that the document does not address night noise in sufficient depth.

At Birmingham, we understand night flying is a very sensitive issue. Overall the night restrictions at Birmingham are one of the most stringent in the UK and the Night Flying Policy was voluntarily introduced in 1996. It was subsequently incorporated into the legally binding Section 106 Planning Agreement that the Airport Company entered into with Solihull Metropolitan Borough Council. This policy limits the number of aircraft that can operate during the night period (2330-0600 hours) and also bans noisier aircraft from operating at all.

A second runway at Birmingham, as outlined in the 'vision' submitted to the Commission, would be remote from the conurbation that adjoins the current facility. A 'night noise preference' – would close the existing runway at night and thus would remove the great majority of the local population from night noise

Birmingham Airport believes that noise management is about having a balanced approach and working hard with the local communities to ensure the economic benefits of aviation are understood whilst employing the best possible methods to mitigate environmental impacts.

Birmingham Airport Night Flying Policy

An example of working together with the community in balancing the economic value of the airport and limiting the environmental impact can be demonstrated by Birmingham Airport's Night Flying Policy review in 2011.

In 2010, Birmingham Airport recognised that its stringent night ATM limit was having a direct impact on capacity of movements at night. The Airport was confronting a situation in which it may be forced to turn down new air traffic. Much of this traffic would have been freight movements critical to the success of local businesses in the West Midlands region, including Jaguar Land Rover.

To overcome this issue, Birmingham Airport worked together with the Airport Consultative Committee (ACC), the local community, Solihull MBC and local councillors to devise a solution. The resulting solution was a mutually beneficial balance. The Airport benefited from increased night time capacity. The surrounding communities benefitted from a more stringent noise mitigation policy for night movements.

Commenting on the agreement, Chairman of Solihull Council's Planning Committee, Councillor Stuart Davis, said: "I'm extremely pleased that, by working closely with Birmingham Airport, we have been able to agree a night time policy that reduces noise levels for our communities, and is also in line with other UK airports, giving Solihull, Birmingham and the wider West Midlands equal economic benefits. I'd like to thank colleagues on the airport working party and the Airport itself for showing true partnership working, with the environment and the local community in mind."

- 5 What baseline should any noise assessment be based on? Should an assessment be based on absolute noise levels, or on changes relative to the existing noise environment?
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Birmingham Airport suggests that background noise levels could also be taken into account in any noise assessment. BS4142 for industry noise is measured against background noise.

- 6 How should we characterise a noise environment currently unaffected by aircraft noise?
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The UK is one of the most densely populated countries in the world, and there are relatively few places which are unaffected by all types of noise. It seems difficult therefore to define certain areas as unaffected by aircraft noise, yet which may be subject to noise from other sources (road, rail etc).

Birmingham Airport supports the principle of maintaining quiet areas across the UK that considers all sources of **noise**. However the Department for Environment, Food and Rural Affairs (DEFRA), together with agglomerations, have yet to define formal quiet areas in the vicinity of Birmingham Airport.

7 How could the assessment methods described in Chapter 4 be improved to better reflect noise impacts and effects?

One issue which could be addressed is the loss of good quality data and research which has been lost through the removal of Planning Policy Guidance Note 24 (Planning and Noise). This document provided useful data and metrics and was tested at many public inquiries, including Heathrow Terminal 5. This document has now been lost through the rationalisation of the planning system and the advent of the National Planning Policy Framework. Whilst the Airport supports the overall streamlining of the planning system, the reintroduction and use of PPG24 and the research underpinning the document would be useful.

8 Is monetising noise impacts and effects a sensible approach? If so, which monetisation methods described here hold the most credibility, or are most pertinent to noise and its various effects?

Valuation of properties around Airports (re: page 36) is extremely complicated. In many cases there are good arguments to suggest that the benefits of living close to an international gateway outweigh or match the disbenefits of aircraft noise.

- 9 To what extent does introducing noise at a previously unaffected area represent more or less of an impact than increasing noise in already affected areas? To what extent should noise concentration and noise dispersal be used in the UK? Where and how could these techniques be deployed most effectively?
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This question goes back to the fundamental question of whether it is better to affect as few people as possible, but to a greater extent, or to spread the noise around so that more people are potentially affected but at a lower level. Technology is such now (e.g. R-NAV) that the distribution of aircraft noise can be controlled to a much greater extent than was previously possible.

Birmingham Airport supports the Government's objective to limit, and where possible, reduce the number of people in the UK significantly affected by aircraft noise. In many cases noise dispersal will introduce more people exposed to aircraft noise.

However, with the introduction of precision navigation, it might be possible to disperse noise more effectively.

Birmingham Airport with two runways has greater potential to investigate the feasibility of dispersal in the long-term providing respite for existing and future communities.

- 10 To what extent is the use of a noise envelope approach appropriate, and which metrics could be used effectively in this regard?
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Birmingham Airport would support further research in this area. There are good and bad examples of how noise envelopes have been implemented in the past.

Noise policy and the consideration of impacts should not only be about the absolute number of people affected but should also consider how an Airport manages noise and integrates itself within the local community.

11 What constitutes best practice for noise compensation schemes abroad and how do these compare to current UK practice? What noise assessments could be effectively utilised when constructing compensation arrangements?

Birmingham Airport supports the noise insulation and compensation arrangements as set out in the Aviation Policy Framework (2013).

Birmingham Airport has the following compensations schemes, agreed locally in consultation:

Scheme	Description	Budget	Numbers
Sound Insulation Scheme	The provision of high specification double glazing, with the highest acoustic quality to reduce the noise impact in homes closest to the Airport.	£200,000 annually	7,600 domestic properties insulated since 1978
Flight School	'Flight School' is a long-term partnership between the Airport, its education partners and Midlands businesses, all working together to create a dedicated learning zone for the exclusive use of schools and colleges.	£80,000 to establish school + loss of commercial space	219 school visits since February 2012.
Community Trust Fund	A fund which makes grants of up to £3,000 available to locally based community projects in those areas most affected by aircraft operations	£75,000 annually	Since 1998: 602 projects supported. Grants total £1.2m
Schools Environment Improvement Scheme	A scheme to assist in mitigating sound arising from the Airport within schools closest to the Airport	£50,000 annually	Since 1998: 12 schools. Total £1,050,000
Community Engagement	Community Outreach, local communications, education support, small grants, sponsorship etc	£18,000 annually	Difficult to quantify precisely –best <u>rough</u> estimate of reach would be c5,000 annually
Other Environmental Monitoring	Adhoc noise monitoring programmes. Does not include noise & track keeping system as this is sensitive commercial information.	£6,000 annually	

Operation Pathfinder	<p>Engaging airlines in noise mitigation measures and improving environmental performance.</p> <p>Includes programmes to improve adherence to Noise Preferential Routes, reduce ground based emissions, manage local airspace to reduce track-miles, fuel burn and emissions.</p>	£1,000 annually	All communities surrounding the Airport and beneath flight paths
'ANITA' bus services	Substantial contributions (in partnership with key stakeholders) to improving bus access to areas to the north of the Airport to improve access to jobs at the Airport	£750,000 over 3 years	Communities under flight paths to the north of the Airport
Section 106 Monitoring	Monitoring fee to Solihull MBC for monitoring of Airport's environmental commitments	£60,000 annually	

12 A final word

Noise will never be popular. In our part of the UK we are conscious of the delicate balance that provides local people with a quality of life. This includes mitigating our negative operational impacts; it also includes the growth and employment opportunities that are derived from linking manufacturing to markets, through an international gateway.

We believe that Birmingham Airport is an example of getting that balance right, which is recognised by key representatives within the local communities:

“I’m extremely pleased that, by working closely with Birmingham Airport, we have been able to agree a night time policy that reduces noise levels for our communities...”

Councillor Stuart Davis, Chairman of Solihull Council’s Planning Committee.