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**Response to the “Aviation Noise Discussion Paper”
by the North West Division of Environmental
Protection UK.**

INTRODUCTION

Before providing substantive strategic and detailed comments relating to the Consultation which closes on September 6th, 2013, the North West Division of Environmental Protection UK wishes to inform the Airports Commission of the Charity’s unique background and why it has authority to comment on the consultation.

Environmental Protection UK is a United Kingdom, “volunteer led” environmental charity, whose members are drawn from across every stakeholder sector in the United Kingdom, where in the North West Division active membership is drawn from Local Authorities as Environmental Protection Regulators, Industry, the Private Sector, Consultancy, Training Establishments and Individuals, some of whom have recently retired with enviable environmental protection competences and experiences, which are regularly updated.

Many members working in Local Authorities and those engaging with Local Authorities on Environmental Noise Control and Planning and Noise issues, have extensive experience managing aviation noise issues where communities are obliged to or have chosen to live surrounding “hub” or “local” airports.

For information, Environmental Protection UK maintains its own website which is [www. environmental-protection.org.uk](http://www.environmental-protection.org.uk) from which further information is available.

Also for information, many active members of the North West Division are also members of other Partner Organisations with interests and competences in Environmental Noise Control, such as the Chartered Institute of Environmental Health and the Institute of Acoustics.

Providing a historical context, Environmental Protection UK can trace its roots back to the foundation in Liverpool

of the Coal Smoke Abatement Society in 1898, making it one of the oldest environmental Non Governmental Organisations working within the United Kingdom with connections across Europe.

One of the founders of the charity, London based artist Sir William Blake Richmond became so frustrated by low light levels in winter caused by coal smoke that in an 1898 letter to the "Times" calling for action he said "the darkness was comparable to a total eclipse of the sun".

Over the following decades the Society was instrumental in the introduction of the 1926 Public Health Smoke Abatement Act, and following catastrophic winter episodic smogs in 1952, the 1956 Clean Air Act, which was preceded by the Report produced by Lord Beaver, initiated community led local air pollution control solutions that we still currently enjoy largely now unnoticed by the population of Great Britain.

As the menace of coal smoke receded, the Society changed its name to the National Society for Clean Air, and then to the National Society for Clean Air and Environmental Protection when it began to campaign vociferously on air pollution from Transport and Industry.

One of the biggest achievements after the Clean Air Acts was the outcome of the charity's actions relating to what we now know as Local Air Quality Management which in the United Kingdom, is compliant with successive European Directives.

Meanwhile from the 1990's onwards, the Charity which is now known as Environmental Protection UK had made significant contributions in the fields of Noise Control and Land Quality where many overlapping synergistic links exist with the existing concerns of air quality, sustainability, energy and waste management. So from "humble beginnings" in controlling visible smoke the charity developed a much wider environmental protection remit which now includes competences in all aspects of environmental noise control.

The Charity works alongside many other partners including Defra, the Health Sector, the Environment Agency, S.E.P.A., the devolved governments of Wales, Scotland and Northern Ireland and numbers amongst its

Vice Presidents, many senior Parliamentarians, and University Academics who support the Charity's vision, principles and its continuity to safeguard future health based Environmental Protection for individual communities, regional and national populations alike.

The Charity manages its core noise control interests through its Nationals Noise Committee, which is one of three such National Committees the other two concentrating on United Kingdom and European Air Quality and Land Quality issues.

Environmental Protection UK is currently a "volunteer led" organisation based around ten Divisions centred on the four countries that make up the United Kingdom. The Charity is strategically managed by a Board of Trustees, where membership is drawn from a varied range of stakeholders which include many Local Authorities, Industry Representatives, those working in teaching establishments, consultants and individuals with a generalist concern for Environmental Protection.

The Charity's recent campaigns have included a Better Tyres Campaign, Noise Action Week (centred around Noise Control), the Black Carbon Campaign, the Healthy Air Campaign, the only UK Guidance on Land Use Planning and Air Quality, Air Quality and Biomass Fuels, and Air Quality associated with the continuing use of Combined Heat and Power.

The Charity recognises the need for all stakeholders to achieve compliance with current and emerging environmental legislation and the place that effective "light touch", "smarter" enforcement occupies as an integral part of Environmental Protection.

The Charity whilst being aware of the complex nature of aviation noise whether from fixed wing or rotary aircraft movements as a noise source, recognises the need to explain strategies and control mechanisms to members of the general public in simple straightforward terminology, where the public in the end, based upon briefings and subjective reaction will have the final say on whether such strategies have been effective.

In preparing comments, the North West Division acknowledges the knowledge of stakeholder partners it

has recent contact with, who are the Manchester Airports Group and the British Helicopter Association both of whom have enviable competences in the way they conduct themselves and whilst discharging responsible noise control strategies for the benefit of wider communities.

The Consultation launched in July 2013 and ending on September 6th 2013 has unfortunately been published at a time when there has been insufficient time for the National Noise Committee to collate wider consensus views from across the ten Divisions but the comments made by the North West Division are intended to be helpful and contribute to the wider debate regarding this subject

From a starting base point, it should be accepted subjectively that

- a) Aircraft noise in the vicinity of airports has a very intrusive character consisting of a succession of sudden high level events separated by much quieter periods. Consequently, aircraft noise measurements generally combine analysis of individual fly-overs and together with long term rating.
- b) Non air side transportation noise from road traffic and railways also contributes to the general noise environment in the vicinity of airports and this should not be forgotten when assessing aviation noise.
- c) There are significant differences in the noise climate in the vicinity of airports that handle predominantly fixed wing movements and those which involve a higher percentage of rotary movements and this should not be forgotten when assessing aviation noise.

and

- d) Very few airports within the United Kingdom can demonstrate that they have commenced their activities from a baseline situation where they have been strategically planned on a site where there has been no previous use. The majority have evolved using the United Kingdom Planning Process over decades as the growth in

popularity, viability and necessity of air transport has occurred, serving a modern economy.

Moving now on to the substantive response being made the North West Division offers the following comments which are divided into strategic comments and detailed comments :-

STRATEGIC COMMENTS

- 1.0 Environmental Protection UK accepts that different descriptors have been successfully used historically to assess aviation noise where this has included "Tone Corrected Perceived Noise Level", "Effective Perceived Noise Level", "Noise Footprints", "Noise Exposure Forecasts" and "Community Noise Equivalent Levels" but Environmental Protection UK accepts that recent pan European dialogue has led to the almost standardised use of "A " weighted sound levels and in particular the use of Laeq's (time period included)
- 2.0 Environmental Protection UK has advocated over successive years that within the United Kingdom the time has now arrived based upon the known clinical effects of prolonged noise exposure, that an Expert Advisory Group Body on Noise is needed. There has existed one for the Medical Effects of Air Pollution (COMEAP) but none has ever been established relating to the Clinical Effects on populations of Environmental Noise

This was called for by the charity in July 2009 following the publication of both the "Draft Report Environmental Noise and Health in the UK" from the Health Protection Agency now Public Health England and "Estimating Dose Response Relationships between Noise Exposure and Human Health in the UK" which was Research commissioned by Defra.

- 3.0 The United Kingdom Parliamentary Office of Science and Technology published authoritative comments in POSTNOTE Number 338 in July 2009 which included references to Aviation Noise.

The POSTNOTE included comments about :-

"The Attitudes to Aviation Noise Sources in England" (ANASE) study which concluded that people were more annoyed by aircraft noise in 2005 than they were in 1980's, although the methodology of the study received some criticism during peer review.

"The Progressive Tightening of Limits for Noise Emissions from Aircraft" where to summarise there appeared to be little incentive to improve on current technology even though the technological development based upon fuel economy and economies of scale may also provide additional improvements in noise emissions from newer aircraft

"Operational Procedures in Aviation" where to summarise the Postnote recognised the noise control advantages on implementing "Continuous Descent Approaches"

- 4.0 The Charity accepts that the implementation of the Environmental Noise Directive 2002/49/EC END has moved matters on considerably in recent years and the many Aviation Noise Action Plans produced which are living documents subject to periodic regular review have contributed much. However there is a variation in the substance to such Action Plans but regionally the North West Division wishes to commend the quality of the Action Plan prepared for Manchester Airport where ideally there would appear to be value in having a comprehensive template in place for when such Action Plans are reviewed, so that a comparison process between airports can take place
- 4.0 The North West Division of Environmental Protection UK accepts the importance of controlling Night Noise in the vicinity of Airports and in particular recommends that the Airports Commission looks closely at the publication " Manchester Airport Night Noise Policy Summer 2007 to Winter 2011 as an example of Best Practice in what can be achieved.
- 5.0 The North West Division values the good work which is being achieved by the group, S.A.S.I.G. - the Strategic Aviation Special Interests Group which is a group of Local Authorities from across the whole of the United Kingdom, all with an interest in strategic

aviation issues. The Group speaks on behalf of Local Authorities representing around 11 million people and aims to reconcile economic, social and environmental issues in a sustainable way. The Group has a website which is www.sasig.org.uk explaining objectives and identified Policy Principles where one North West Local Authority is a key member of SASIG.

DETAILED COMMENTS

6.0 IN relation to the Introduction :-

On page five the Charity agrees with much of the information summarised in Chapter 2

On page five the Charity agrees generally with much of Chapter 3 but subject to other comments to be made.

In Chapter 4 the Charity wishes to highlight the findings of the E.C sponsored RANCH survey conducted in the Netherlands, Spain and the United Kingdom referred to in the July 23009 POSTNOTE published by the Parliamentary Office of Science and Technology – this refers to the lower than expected performance of adults and children in cognitive tasks where they are affected by prolonged noise, aviation noise in particular.

On page 5 the Charity wishes to highlight the approach to Night time Noise taken by Manchester Airport and illustrated in the document “Nighttime Noise Policy Summer 2007 to Winter 2011”.

In Chapter 2 on page 7 the Charity wishes to highlight the context and relevance of figure 2.1 and Table 2.1 which relate to Manchester Airport.

In Chapter 2 on page ten the Charity wishes to highlight the variability in individuals in the subjective reaction to aviation noise and also highlight that the only practical way forward is to rely on the empirical consensus which can be achieved through continued subjective survey and research work on this subject.

In Chapter 2 on page 11 the Charity agrees that there are significant difficulties in assessing annoyance and sleep disturbances.

In Chapter 2 on page 15, the Charity wishes to highlight the importance to communities of the "Quiet Area" approach where action is required by Local Authorities

In Chapter 3 on page 28 the Charity accepts that no one descriptor can with confidence effectively rate the exposure by individuals to both short and long term exposure to aviation noise and perhaps this should be prominently explained to the general public in any statements that are to be made on the subject of aviation noise.

In Chapter 4 on page 35 the Charity does not wish to comment specifically as it has little experience in this area. However a general statement is made that the approach to monetising noise impacts is academic and interesting and perhaps indicates the priorities for the future amongst the general population as which areas should receive priority.

The charity is of the view that monetising noise impacts could skew the way that outcomes are achieved for health impacts, where managing solutions for adverse health impacts professionally and in a way that is helpful to communities should always be a priority over any monetising approach.

In reference to page 38 the Charity does not believe it is always helpful to monetise noise impacts.

In Chapter 4 on page 39 the Charity does not believe there are many examples in the United Kingdom where it is possible to say that introducing noise at a previously unaffected area represents more or less of an impact. It is aware however, that considerable work on assessing the likely effects of aviation noise was conducted around Doncaster Robin Hood Airport by the Health Protection Agency around 8 years ago and looking in more detail at what conclusions were reached, may well be very helpful.

In Chapter 5 on page 43 the Charity wishes to highlight the importance of effective land use planning policies around airports and suggests that the Manchester Airport approach in complying with the Second Runway Planning inquiry outcomes is a fair and manageable way to make conclusions based upon community needs.

In Chapter 5 on page 44 the Charity wishes to re-emphasise the value of "Continuous Decent Approach" as an operational procedure.

In Chapter 5 on page 46 the Charity wishes to emphasise an approach that Manchester Airport have previously used which is for the Airport Authority to recognise on an annual basis an airlines overall performance in achieving no or minimal contraventions against tracking and noise departure limits.

In Chapter 5 on page 48 the Charity is of the view that the use of the Noise envelope approach may be an over simplification of the way that an assessment is being made. However it agrees that more scientific research is required in this area.

This submission is made entirely on behalf of the North West Division of Environmental Protection UK and reflects the views of that Division where as stated earlier it has proved not possible to provide a national consensus on this subject nationally across the ten Divisions that for the charity Environmental Protection UK.

7.0 Future contact with the Division can be made through the Secretary John Dinsdale, through :-

j.dinsdale215@btinternet.com

**This submission dated September 5th, 2013.
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