

## NOISE ACTION PLANS

### What this paper is about

To update members on:

- the drawing-up of draft *Noise Actions Plans (NAPs)*,
- consulting locally about the draft NAPs
- finalising the NAPs for submission to Defra/DfT.

The paper also provides an opportunity for members to share experience of these processes and to talk about any lessons learned.

### Points for Discussion

Members may like to share experience gained in the drawing up of the draft *Noise Action Plans*, the consultation process and finalising and submission of the plans to the Government and to talk about any lessons learned.

### Points for Possible Action

The meeting will wish to decide whether to submit any representations in respect of any lessons to emerge from the discussion of the paper

**Note:** Most of the regulations, directives, consultation papers and reports referred to in this report can be readily accessed from the Liaison Group's website at <http://www.ukaccs.info/>. The Secretariat is happy to provide electronic or hard copies of any of these documents if required. The site is regularly updated and is a ready source of current information on UK initiatives in aviation.

1. We have reported previously about *European Directive 2002/49/EC - Assessment and Management of Environmental Noise (END)*<sup>1</sup> which came into effect in June 2002. The Directive was transposed into UK law by the *Environmental Noise (England) Regulations 2006 (SI 2006/2238)* – the “2006 Regulations”.
2. The aim of the END is to define a common approach across the European Union with the intention of avoiding, preventing or reducing on a prioritised basis the harmful effects, including annoyance, brought about by exposure to environmental noise. According to the Regulation This involves:
  - informing the public about environmental noise and its effects;
  - the preparation of strategic noise maps for large urban areas (known as 'agglomerations' ), major roads, major railways and major airports as defined in the END;
  - preparing action plans based on the results of the noise mapping exercise.

The aim of the noise action plans (NAPS) is to help manage and reduce environmental noise where necessary, and preserve environmental noise quality where it is good.

3. We reported last year on the publication of the noise maps for airports<sup>2</sup>. The maps were the precursor to the preparation by airport operators of the *Noise Action Plans (NAPS)*.
4. After a period of consultation Defra issued (on 24th March 2009) its Guidance to airport operators on the drawing up of NAPS. Airport operators were required to prepare their NAPs having regard to the Guidance and according to the following timetable:
  - By 1st July 2009 : Formal Consultation on draft noise action plan commences
  - By 21st October 2009 : Formal Consultation ends
  - By 30th November 2009 : Draft Noise Action Plan and accompanying summary to be sent to the Secretary of State for Transport and copied to the Secretary of State for Environment, Food and Rural Affairs
5. Defra said this timetable had been prepared to take account of, and correspond with, the expected progress on the preparation of the other noise action plans required by the Regulations.
6. As expected the Guidance said airport operators should “engage” with Airport Consultative Committees “in the development of the draft Noise Action Plan”. The Airport should also liaise with the local planning authority and other local authorities affected by the airport, as well as NATS and airline operators. Operators might also wish to consult local amenity groups with whom they would normally engage over airport issues. There would then follow a period of consultation with the public about the draft NAP with 16 weeks allowed for the submission of comments.
7. The Guidance goes on to say that airport operators should then “examine and reflect upon the comments” received in consultation and complete the Draft Noise Action Plan including a description of the comments received during the consultation process and a reasoned justification for the response to the issues raised. If there were any unresolved conflicts between the Airport’s NAP and the action plan for the agglomeration (where applicable), these should be reported in the NAP.
8. So throughout the summer of 2009 most airports were busy in drawing up noise action plans, consulting about them and then finalising them for submission to Defra and the DfT. By the beginning of 2010 most of the plans had been submitted but at the time of writing none had been approved.
9. In the Annex to this paper are comments received from eleven member committees on how well the consultation process had operated locally along with a note of any issues and/or

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<sup>1</sup> <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32002L0049:EN:HTML>

<sup>2</sup> [See the Defra website](#)

lessons learned. If any further contributions are received they will be incorporated in supplementary paper to be issued at, or just before, the meeting.

10. Meanwhile on 15th March 2010 Defra published the *Noise Policy Statement for England (NPSE)*<sup>3</sup> as well as:
  - The Noise Action Plans for the 23 first round agglomerations including those covering the areas of the UKACCS member airports at Bournemouth, Bristol, Liverpool, London, Manchester, Sheffield, Southampton, Teesside, Tyneside, West Midlands and West Yorkshire.
  - The Noise Action Plan for major roads outside agglomerations;
  - The Noise Action Plan for major railways outside agglomerations.

The Noise Action Plans can be seen on Defra's website<sup>4</sup>

11. Last year we reported that it was proposed to amend the 2006 Regulations. The deadline for comments was 11th May 2009 and the Department published the responses to the consultation<sup>5</sup> the following month. The amending Regulations - *the Environmental Noise (England) (Amendment) Regulations 2009 (S.I. 2009/1610)*<sup>6</sup> - came into force on 25th July 2009. And on 11th February 2010 there was a further amendment of the Regulations in the *Environmental Noise (England) (Amendment) Regulations 2010 (SI 2010/340)*<sup>7</sup>.
12. The information above applies mainly to airports in England but similar requirements apply elsewhere in the UK. In Northern Ireland the Noise Action Plans for Roads, Railways, Industry and Belfast International Airport were approved and adopted by the Environment Minister on 5 March 2010. These Action Plans are available on Department of Environment's website<sup>8</sup>. For the latest in Scotland and Wales refer to the websites of the Scottish Government and the Welsh Assembly Government respectively.

**Stuart Innes**  
**May 2010**

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<sup>3</sup> <http://www.ukaccs.info/npse.pdf>

<sup>4</sup> <http://www.defra.gov.uk/environment/quality/noise/>

<sup>5</sup> <http://www.defra.gov.uk/corporate/consult/enviro-noise-regs2006/summary-responses.pdf>

<sup>6</sup> [http://www.opsi.gov.uk/si/si2009/uksi\\_20091610\\_en\\_1](http://www.opsi.gov.uk/si/si2009/uksi_20091610_en_1)

<sup>7</sup> [http://www.opsi.gov.uk/si/si2010/uksi\\_20100340\\_en\\_1](http://www.opsi.gov.uk/si/si2010/uksi_20100340_en_1)

<sup>8</sup> [http://www.doeni.gov.uk/index/protect\\_the\\_environment/local\\_environmental\\_issues/noise/](http://www.doeni.gov.uk/index/protect_the_environment/local_environmental_issues/noise/)

**Noise Actions Plans – Comments from Member Committees****Aberdeen**

Aberdeen's Noise Action Plan was completed in 2008. The airport has recently begun a consultation for a Noise Insulation Scheme at Aberdeen. It applies to residential properties that lie within the '66 decibel contour', a measurement of noise set out by the UK air regulator the Civil Aviation Authority. By using this measurement, Aberdeen Airport's scheme falls into line with similar ones already in place at airports including Glasgow, Edinburgh and Gatwick.

This consultation scheme allows local residents who live within the boundary to apply for the total cost of installing secondary glazing to existing windows OR 50% towards the cost of installing standard double-glazed PVCu replacements windows OR 50% towards the cost of high spec replacement windows specifically designed to minimise noise impacts.

**Bristol**

The public consultation on the draft Noise Action Plan for Bristol Airport was launched on 1 September 2009 with a deadline for responses of 22 December 2009. The consultation was widely publicised in the local media and advertisements were placed in the Chew Valley Gazette, the Weston and Somerset Mercury and the North Somerset Times. The consultation and the draft Noise Action Plan were also signposted from the home page of [www.bristolairport.com](http://www.bristolairport.com) and analysis of the website shows that there were 363 visits to the Noise Action Plan page during the consultation period.

Airport management held two public sessions to discuss the draft action plan and to clarify queries at Yatton and Felton on the 13 October and 10 November respectively. These sessions were well advertised in the local press and generated some interest, although attendance at the Felton session was disappointing. Airport managers also made themselves available to discuss the draft action with affected Parish Councils and two such sessions were held, at Congresbury and Backwell.

Bristol Airport engaged with the Airport Consultative Committee during the preparation of the draft action plan and during the consultation period. The members of the Consultative Committee were provided with a copy of the draft action plan and the minutes of the meeting held on 21<sup>st</sup> October record that the Committee noted the consultation draft and information provided and referred the plan to its Environmental Effects Working Party for detailed consideration. The Working Party membership was augmented with other local representatives from the Committee for the consideration of this item.

The consultation process was a success in so far as a good range of issues were covered in the responses. However there was a very low level of interest shown in the consultation from the general public and attendance was very poor at the Felton outreach event.

Many of the responses from organisations centred around science and policy, discussing at length, for example, the relative merits of Lmax and Leq and the rights and wrongs of ANASE.

The timing of the consultation in relation to the submission of the Airport's planning application did not help and the different method of noise measurement added to the confusion.

A comprehensive analysis of the responses received to the consultation process and the Airport's response is attached<sup>9</sup>.

**Birmingham**

Noise management is given top priority at Birmingham International Airport. Aircraft noise, both air and ground has long been recognised by the Airport Company as a sensitive issue for the local community and as such, a comprehensive noise mitigation plan has been in existence for many years. Through the Noise Action Planning process, this set of noise mitigation plans have been formalised into the Birmingham Airport Draft Noise Action Plan.

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<sup>9</sup> <http://www.ukaccs.info/10almfiles/brsnapanalysis.doc>

Birmingham Airport produced its Draft Noise Action Plan in line with the requirements of Department for Environment Food and Rural Affairs (DEFRA) Guidance. This included developing the Draft Noise Action Plan with the engagement of the Airport Consultative Committee and its environmental subgroup (Environment Monitoring Working Group). As part of this engagement, the groups were firstly advised of the regulatory requirements for noise mapping and the DEFRA Guidance. The key themes and noise actions were then agreed, prior to developing the Draft Noise Action Plan for consultation. The over-riding objective of the Draft Noise Action Plan is to assess, manage and where possible, improve the noise climate around Birmingham International Airport.

The formal consultation was launched on 1st July 2009, for a period of 16 weeks, ending on 21<sup>st</sup> October 2009. Through the consultation, the Airport Company sought engagement with its key stakeholder, through a range of platforms including local community venues and public events.

A review of all English Draft Noise Action Plans was undertaken by Noise Bulletin (leading noise journal). It concluded that of all the Noise Action Plans, "Birmingham's was among the most readable.' Furthermore, it stated that 'Birmingham had the most extensive consultation, with 12 public meetings (one daytime, one evening) at six different locations'.

In further recognition of Birmingham Airport's Noise Action Plan and associated consultation, the Airport Company was invited to present on Noise Action Planning, at a Noise Workshop, hosted by Environmental Protection UK in March 2010.

The formal consultation on the Draft Noise Action Plan ended on 21st October 2009. All consultation responses were analysed in detail and comments considered. Where appropriate, amendments were made. The revised Draft Noise Action Plan was submitted to the Secretary of State (Environment Food & Rural Affairs; and Transport), prior to the 30th November deadline. Accompanying the Draft Noise Action Plan was a Summary document and a Consultation Report. Birmingham Airport is presently awaiting a response from Government.

## **Bournemouth**

The Chair, Vice Chair and Technical Representative of the Consultative Committee met with the following people to discuss the Airport's Noise Action Plan:

- MD of Bournemouth Airport
- Planning Adviser for the Manchester Airports Group (MAG)
- Environmental Director for MAG's Regional Airports
- Operations Director of Bournemouth Airport
- SATCO of Bournemouth Airport
- Deputy SATCO of Bournemouth Airport
- Environmental Manager of Bournemouth Airport

Two meetings were held. The first was to discuss and input into the draft Noise Action Plan and the second to review the final document. Both meetings were productive and useful for all parties. After the first meeting, the Airport gave a presentation on the draft NAP to the Consultative Committee's AGM in July 2009 and encouraged Members comment.

The NAP was submitted to DEFRA in November, within the Government set guidelines. During the consultation period, members of the Bournemouth Airport Management Team attended various local public meetings to give a presentation on the NAP. The Technical Representative of the Consultative Committee also attended the meetings, so as to provide an independent view, if called upon.

The Airport's consultation was not only conducted within the specified noise contours but extended to a considerable distance outside of the contours (covering the area having Consultative representation), to give those areas a full opportunity to discuss their plan.

A lesson learned from the Noise Action Plan process was to expect to have to deal with a lot of concerned local residents, fuelled by reading misinformation in the press. Also, any press coverage on the NAP generated more noise complaints, even though operations had not changed, as the subject of potential aircraft noise had been heightened in people's consciousness.

## **East Midlands**

EMA carried out a public consultation process on the Draft Noise Action Plan which focused on the area affected by the Noise Mapping Exercise in accordance with Government guidance. Outreach events were held at a number of local communities and stakeholders within the area affected were consulted.

Following the consultation, a revised Draft Noise Action Plan was submitted by the deadline in accordance with the Guidance.

The consultation process was basically similar to that carried out in respect of the earlier Master Plan, although within a more constrained area due to the more limited scope of Noise Action Plans themselves. The absence of impacts on any first round agglomerations no doubt simplified the process. Some confusion resulted from the lack of understanding of the difference between the Master Plan consultation, flowing from The Future of Air Transport White Paper and the Noise Action Plan consultation flowing from the EU Environmental Noise Directive. The fact that both of these need to be reviewed on five year cycles which do not coincide provides plenty of opportunity for continued confusion in the future, which is a point that we have made to Government.

## **Edinburgh**

We consulted on the Noise Action Plans in 2008. We are slightly ahead of England in this respect as they are only now consulting on the Noise Action Plans.

We worked closely with the Scottish Government on developing the action plans and throughout the consultation period. We consulted from May to July 2008 and received 13 responses. All these were directed through an independent organisation who calibrated the responses. We wrote back to all the respondees and made several changes to the Noise Action Plan, including adding some new actions. The final plans were published in December 2009.

One of the commitments made in the Noise Action Plan was to consult on a new Noise Insulation Scheme around the airport. We carried out this consultation from December 2009 - February 2010, and have now launched a Noise Insulation Scheme around the airport.

## **Glasgow**

The Glasgow Noise Action Plan can be seen on the Airport's website<sup>10</sup>. The draft plan was put out for consultation in May/July 2008. Key stakeholders were written to in order to informing them of the consultation process and details were included in a community newsletter sent to local residents. The consultation attracted only nine responses along with 702 identical letters which outlined the concerns of local residents with respect to the draft plan. These were accompanied by a covering letter from a Member of Scottish Parliament. The key themes to emerge from the consultation were:

- best practice targets should be set;
- take-off and landing flight paths should be altered to minimise noise impacts on densely populated areas;
- fining noisy aircraft;
- the draft noise action did not set any 'real' targets or goals and questioned whether the airport could actually effect any reductions in noise from aircraft;
- the local areas discussed specifically by the noise action plan were not always comprehensive and that some other areas were not being identified as priorities by the plan; and
- night-time flights, ground running and the frequency of flights with respect to aircraft noise.

In November 2009 Glasgow Airport launched its noise insulation scheme public consultation. It was proposed that the airport adopts a scheme to meet the cost of insulation for properties within the 66db noise contour. The airport also proposed an increase in community funding to

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<sup>10</sup> [Click here to see](#)

areas which lie underneath the flightpath. The consultation closed on January 31 with most responses in favour of the noise insulation scheme and the introduction of the dedicated Flightpath Fund.

Glasgow Airport responds to all noise enquiries within three working days and will endeavour to supply the enquirer with as much information as possible regarding their enquiry.

### **Liverpool**

The Airport completed its consultation as per the guidelines, including consultation with the ACC and its members. The results were provided to the relevant Government Departments as per the timescales originally indicated, however to date the Airport is yet to receive feedback

### **London City**

Because of a planning application and an associated section 106 agreement which includes a number of new noise provisions the Noise Action Plan at London City was drawn up later than most. As required by the Defra Guidelines the draft was discussed with the Consultative Committee before it was published for consultation.

The consultation exercise mounted by the Airport was extensive. In addition to more than 400 letters and emails there were public meetings in four locations convenient for residents in the Airport's 2008 57dB LAeq contour at which the responsible officers of the Airport made themselves available to answer questions. Flyers outlining the details of these sessions, and where to find details of the Plan online, were distributed to more than 33,000 local homes within the area of the contour. In addition there were advertisements in local press. These referred to copies of the draft NAP which were placed in all libraries in ten East London boroughs.

The closing date for comments on the draft plan was 15 January 2010. There were 38 written responses to the draft plan and another 55 people responded via the website facility. Comments were received from the London Boroughs of Newham, Greenwich, Tower Hamlets, Redbridge, Waltham Forest, Southwark, Lewisham and Havering. In spite of reminders from the Airport there was no response from the other four local councils which had been sent details of the draft NAP.

At its last meeting in April 2010 the Committee heard that the Airport's environment team had been busy reviewing the comments received during the public consultation period and incorporating the themes into the final text of the Plan. It was hoped to submit the final plan to *Defra* and to the *Department for Transport* very shortly.

LCY is particularly alert to the importance of consulting surrounding local authorities following recent issues arising between its planning authority (Newham) and surrounding boroughs on the issue of consultation. However, some of the neighbouring boroughs felt they had nothing to contribute and no response was received. LCY feel there is a need for more communication with those boroughs about the need, in the interests of local people, to read and comment on such documents.

The local public meetings attracted very few visitors and those that did attend were not always armed with appropriate questions or comments. The meetings were not judged to be cost effective and it is unlikely that in future they will be mounted on the same widespread basis.

The comments received varied in length and content with some completely removed from the topics covered in the document. In the future, particularly where data prescribed by DEFRA or other Government institution is used, it is likely that LCY will include a short sentence on this at the top of the response questionnaire.

There was a very large number of comments about the use of 2006 as a baseline for the strategic noise maps – this of course was outside the control of LCY.

### **London Heathrow**

Heathrow has submitted its plan to the DfT. Some members of HACC most concerned with reducing the impact of noise have asked to see a copy, but publication has been rejected until

the DfT has responded. There was some complaint that more publicity should have surrounded the consultation exercise, even including the suggestion that all households likely to be affected should have received a mailing. My take is that the majority of HACC members feel that the airport acted reasonably.

## **London Gatwick**

As soon as the Government's guidance on the preparation of NAPs was issued, Gatwick Airport Limited drew up a programme for the development, consultation and submission of its NAP. The Consultative Committee, as well as Gatwick's Noise and Track Monitoring Advisory Group, Flight Operations Performance Committee, SASIG, Airlines Operator's Committee, NATS and local authorities were consulted on the development of the plan prior to the formal public consultation through various meetings and open sessions at the airport. Members of local interest groups and individuals were also involved in this process.

A draft action plan was then completed and published for public consultation on 18<sup>th</sup> June. The 16 week consultation closed on the 7<sup>th</sup> October by which time Gatwick Airport Limited had received 275 written responses.

The draft action plan was then amended and finalised into final draft version and submitted to the Secretary of State for Transport and copied to Secretary of State for Environment, Food and Rural Affairs on the 3rd December. During the consultation period, the airport held three public sessions at the airport where the public, residents and local interest groups could hear from Gatwick Airport Limited about the draft NAP and ask questions about the long term goals for managing aircraft noise. Unfortunately, despite the efforts of the airport to engage with the local community, the sessions were not very well attended. The Consultative Committee has suggested that in the future to encourage greater attendance, the airport might like to consider holding the events in the local community rather than at the airport.

The public consultation feedback highlighted several common areas of focus, flight paths, night noise, track keeping, over flight of areas of outstanding natural beauty and numbers of aircraft operating at Gatwick. Gatwick Airport Limited has advised that the draft plan has been amended as far as practicably possible to reflect all feedback received.

The consultation period invited feedback from a range of stakeholders, key themes and a summary of this has been included in the final draft action plan in order to demonstrate a transparent approach. The DfT and DEFRA have indicated that they are in the process of reviewing all submitted action plans.

The Consultative Committee responded to the formal consultation. The inclusion of performance indicators in the NAP was welcomed but members felt that Gatwick Airport Limited needed to re-consider the wording of the indicators to make them SMART and capable of providing a measure of progress against the action promised. The DfT has advised that as the NAP was an active document, the DfT was looking for airports to come forward with measurable objectives over the timeframe of the NAP to address noise issues. The DfT has reassured the Committee that the inclusion of meaningful performance indicators was something that would be considered as part of its review of the draft plan.

## **London Luton**

LTN has an active set of community groups represented on the CC and the NTSC. They would say that there was not enough 'action' in the plan to reduce noise nuisance. They would also suggest there was too much emphasis on consulting, discussing and measuring and not enough on reducing, capping or curtailing. On the other hand, the LTN NAP stacks up well against the other airports and contains 55 or so 'actions' of which 20 or so are truly new. The big issue at LTN was that DfT/Defra asked for a list of problems and the actions to be taken to address them. The Airport's basic position is that they operate well inside the constraints of their planning permissions and therefore there were no problems requiring immediate and significant action. Naturally the community groups disagreed.

As to the consultation process, I think LTN pitched this about right (once again the community groups would disagree). The Airport held 2 exhibitions; placed information on the web-site and in the local press; contacted local councils down to parish council level; and offered to come to

any group and give them a bespoke presentation. I think in the end everyone with an interest was given attention by the airport - some community groups felt the information was too technical and therefore a bit difficult to respond to.

I think one of the major difficulties with the exercise was the 'one size fits all' nature of the guidance from DfT and the EU. It is hard to envisage a system of NAPs that will be equally applicable to Luton and Tallin for example. Indeed even comparing Luton with London City would be difficult.

### **London Stansted**

The response sent by STACC to the DfT has been posted to the UKACCS website<sup>11</sup>. Members worked closely with Andy Jefferson of Stansted Airport in preparing this and took expert advice from Martin Peachey who has a long experience in these matters and who speaks for STACC on ANMAC. STACC was happy to leave the detailed work to this small group and then endorse the action taken. The outcomes will be monitored by our Environmental Issues Group of STACC.

### **Manchester**

The draft Noise Action Plan was available to view on the Airport's website and over 400 copies of the draft noise action plan were circulated to consultees and copies were sent to all libraries in Greater Manchester, Warrington, Cheshire East and parts of Cheshire West. Seven public events were held to answer questions and in total 268 people attended. Briefing sessions were held for Parish Councils in Cheshire, Warrington and Trafford.

A total of 60 Responses were received. As a result of postal strikes the public consultation period remained open for an extra two weeks. The Manchester Evening News responded that the document was difficult to understand, the content was technical and not easy to read. As a result of this, the Airport produced a version of the Action Plan in black and white, which was approved by the Plain English Campaign. This version was available on the Airport's website, along with the original colour version.

The draft plan was amended in view of the comments received during the public consultation. A half-day workshop took place with Environmental Health Officers from the Airport's surrounding local authorities to consider and agree the amendments.

The Consultative Committee, at its meeting on 23 October 2009, were briefed on the consultation process and welcomed the very public consultation that had taken place and commented favourably on the contents of the draft Plan.

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<sup>11</sup> <http://www.ukaccs.info/10almfiles/staccnapresponse.pdf>