Analysis of the EMA Draft Noise Action Plan

1. The overall position in the DNAP is that the airport believe that the existing measures that they have in place, as outlined in Appendix 1, are sufficient and that no additional measures are required.

2. The way the EU requirement has been transposed by UK government in the form of the regulations and guidance means that the NAPs have limited scope. Nevertheless, the following comments can be made on the DNAP.

Responsibility and Enforceability

3. The responsibility for preparing, monitoring and enforcing the NAPs rests with the EMA so there is no real independent means of control over what the airport propose to do as part of the NAP or any independent scrutiny of or sanction against any of the regimes in place

Quieter Aircraft:

4. The EMA states that it is their target, as set out in the Master Plan, to achieve Chapter 4 compliance on all aircraft by 2012. The DNAP states that currently 64% of aircraft are Chapter 4 compliant and that it is "on target". No information is provided to demonstrate the rate of improvement (say from the Master Plan base) or what mechanisms are in place to ensure that compliance will be achieved, for example will all non compliant aircraft be banned from the airport? Otherwise the target is nothing more than aspirational.

Continuous Descent Approach (CDA)

5. The DNAP states that the CDA target of 80% has been surpassed and that in 2008 average CDA compliance was 84% compared to 75% in 2006. Whilst this target has clearly been met it would be helpful to understand how the target was chosen and what would be the ultimate upper limit? A 100% target would not be possible because of air traffic control requirements but some evidential or reasoned basis for target parameters would demonstrate the extent to which the EMA can make further progress in this area.

1996 Night Noise Contour limit

6. The DNAP repeats the Master Plan target of not exceeding the 1996 night noise contour ($57dB_{LAeq,8h}$) of 14.6 sq.km upto 2016. The contour increased from 7.9 sq.km in 2006 to 9.5 sq.km in 2007, an increase of about 20% in area. The night time air traffic movements increased by just under 11%. Of those movements, mail increased by nearly 18% and freight by 3%. It would be helpful if a map showing the change in contours is produced comparing to the 2016 target.

7. There remains a fundamental problem with this measure. No explanation is given as to why 1996 has been chosen as the benchmark date when clearly the noise impact is so much lower now than then. There is no assessment as to whether the 1996 level to which the airport is heading was acceptable then or will be acceptable by 2016. There is no indication of what happens when the 1996 limit is reached or what happens beyond 2016. It is counter intuitive to have a target that seeks to expand the noise impact significantly above what it has been in recent times. An

analysis of the correlation between the growth of the contour and the lesser growth of air traffic would be helpful to understand the relationship, otherwise the simple conclusion might be that noise impact is expanding faster that air traffic growth.

Noise Maps

8. The DNAP should be based on the strategic noise maps produced as part of the EU directive based on 2006 data. The DNAP refers to EMA's own mapping exercise set out in the Master Plan and the 1996 night noise contour. These maps use different criteria to measure the same thing – namely how many people are exposed to differing levels of noise impacts. The DNAP acknowledges that the number of properties and people affected by the two mapping techniques differ - 950 dwellings and 2,100 people under the strategic mapping technique and 550 dwellings and 1,200 people under the airport's mapping technique.

9. EMA state that the difference between the techniques and exposure levels are not significant and that their current amelioration programme is adequate as it stands. There is clearly scope for confusion and it would be helpful if some like for like map comparators were used. The 5 maps included show the Strategic Noise Maps (see Appendix 2 as an example) but also includes the 2006 L_{AEQ16h} noise contours. Whilst this demonstrates the similar shapes, their extents differ and they do not for example show the 2016 target night contour which is based on 8hr time period as opposed to 16hr.

Night Noise Metric

10. The EMA and the County Council have developed a Night Noise Metric which monitors the amount of people affected by night noise by means of an index. The measurement seeks to show the trend of noise affects on people over time and is calculated annual by using actual flight data. The metric is a tool which demonstrates changes over time and when compared to the change in aircraft activity over the same period will indicate how well noise controls are working. This measure would benefit from at least another year's data but in the meantime it would be helpful if that metric could now be developed further from a static monitoring tool to a dynamic one that sets out targets. In other words, as part of the DNAP, EMA should assess how the metric can be used to set targets and test its sensitivity to mitigation measures introduced to reduce noise impact.

Noise penalty scheme

11. The DNAP restates the operation of the penalty scheme and whilst some information has been given to the number of fines (22) and the income from those fines (£22,050) there is no indication as to whether the fines are a sufficient deterrent or whether operators just consider the fine as partof their operational costs. The DNAP should include an analysis of its effectiveness.

Sound Insulation Grant (SIG)

12. The DNAP states that it will continue with the SIG in accordance with the Master Plan. Although the SIG was reviewed at the time of the Master Plan no consideration has been given in the DNAP of expanding the noise insulation grant scheme further and reducing the threshold noise limit.

Community Fund

13. The DNAP refers to the Community Fund which is built up from surcharges and penalties on noisy operators. The Community Fund is well established and funds many community projects. However, it would be helpful if the DNAP considered whether the Community Fund could be more directly used in noise mitigation or prevention.