

Aviation Policy Framework
Department for Transport
Great Minster House (1/24)
33 Horseferry Road
London SW13 4DR

29 October 2012

Dear Sir,

Draft Aviation Policy Framework. Chapter 4: Noise at other local environmental impacts

The Association of Noise Consultants welcomes the development of the draft Aviation Policy Framework, and the detailed consideration given to aircraft noise in the consultation document and especially in Chapter 4. ANC represents 117 consultancy firms providing advice in noise, acoustics and vibration. Members contribute to detailed discussions on airport noise matters throughout UK which unfortunately are usually adversarial, and will be assisted by clear numerical national guidance with agreed variations to relate to local conditions, tranquil areas etc.

With regard to the key questions specifically on noise, as delineated in Chapter 4, the responses submitted to ANC by members in preparing this response are given below.

We would suggest that to avoid erroneous statements there is a need to avoid mixed use of numerical values expressed in different units. In particular that used in the UK for many decades, the summer period average mode daytime average continuous sound level dB LAeq,16h, and the more recently devised EU strategic noise mapping unit, Lden, the annual period average 24 hour daily level. The latter has not been validated for use in UK for noise impact assessment, and includes a completely arbitrary weighting for noise in the evening. Because of the difference in the balance between day, evening and night-time activity at UK airports the relationship between Lden values for airport and their LAeq,16h values differs by amounts varying from 0-6 dB for reasons which do not have proper scientific support.

There is also need to avoid erroneous comparisons of night noise, expressed in units such as summer average mode LAeq,8h, summer average mode LAeq,6.5h, and the EU unit Lnight, annual average.

Chapter 4: Noise and other local environmental impacts

- *Do you agree that the Government should continue to designate the three largest London airports for noise management purposes? If not, please provide reasons.*

Yes.

- *Do you agree with the Government's overall objective on aviation noise?*

Yes. To ensure this high-level policy objective can be adequately monitored and achieved the objective should be complemented by clarity over what are the criteria for "significantly affected" by both daytime noise and night-time noise.

- *Do you agree that the Government should retain the 57 dB $L_{Aeq,16h}$ contour as the average level of daytime aircraft noise marking the approximate onset of significant community annoyance?*

Yes. Although this criterion has been used for many years, and is based partly on the 1982 ANIS study, without a technical valid new study of aircraft noise and its effects in UK no basis exists for a change. Translation of the results of studies at other European airports is not valid, as studies at airports such as Schiphol, Frankfurt, Munich, and Zurich all produce local different relationships. Whilst agreeing with the current retention of the 57 dB $L_{Aeq,16h}$ criterion, ANC suggests that further research work to establish an up to date relationship between community response and aircraft noise in UK is necessary as some increase in sensitivity to noise appears possible from research carried out elsewhere. This does not require great expenditure as the noise levels around UK airports are adequately quantified, and therefore only the social survey consultation is now required, and the subsequent analysis.

- *Do you think that the Government should map noise exposure around the noise designated airports to a lower level than 57 dBA? If so, which level would be appropriate?*

Yes. Daytime contours should be also mapped down to 54 dB $L_{Aeq,16h}$, as undertaken by the CAA ERCD scientists for the past administration. Such mapping should also quantify night noise, both in terms of dB $L_{Aeq,8h}$ and noise footprints 90 dB (A) SEL as advised in CAP 725 (published by the CAA in March 2007).

- *Do you agree with the proposed principles to which the Government would have regard when setting a noise envelope at any new national hub airport or any other airport development which is a nationally significant infrastructure project?*

Yes.

- *Do you agree that noise should be given particular weight when balanced against other environmental factors affecting communities living near airports?*

Yes. Noise is an unfortunate consequence of flying activity, as it is for other forms of transport viz cars, buses, motorcycles, lorries, trains etc. It is the impact which causes greatest

community concern, and causes restrictions to be applied on growing UK's connectivity and creation of jobs.

- *What factors should the Government consider when deciding how to balance the benefits of respite with other environmental benefits?*

In deciding on the benefits of respite the Government should appreciate this relates not to less noise on the local community just redistribution. Such redistribution should be resolved by local stakeholders. The Government needs to address the expected problems arising from LAMP and use of R-NAV 1 departure routes with respect to the extreme concentration of overflying arising from the latest computerised navigation techniques, and the general existing principle of ensuring aircraft fly over locations in line with expectations for existing householders.

- *Do you agree with the Government's proposals in paragraph 4.68 on noise limits, monitoring and penalties?*

Yes.

- *In what circumstances would it be appropriate for the Government to direct noise designated airports to establish and maintain a penalty scheme?*

As all UK designated airports have penalty schemes there is no need for direction.

- *In what circumstances would it be appropriate for the Government to make an order requiring designated airports to maintain and operate noise monitors and produce noise measurement reports?*

As all UK designated airports have noise monitors and produce noise reports there is no need for such an order.

- *How could differential landing fees be better utilised to improve the noise environment around airports, particularly at night?*

The differential landing fees should be related to the Q.C. value of the aircraft. The Q.C. classification for current and future aircraft should be kept up to date by the CAA, who represent the UK at the technical ICAO meetings, and be based on the publically available EASA data base.

- *Do you think airport compensation schemes are reasonable and proportionate?*

No. There are various airport compensation schemes which vary in their detail and eligibility. Not all are reasonable and proportionate.

- *Do you agree with the approach to the management of noise from general aviation and helicopters, in particular to the use of the section 5 power?*

Yes.

- *What other measures might be considered that would improve the management of noise from these sources?*

Unlike fixed wing aviation, little effective noise monitoring is made concerned with raised community concerns and general aviation and helicopter aircraft activities. A Code of Practice needs to be available to minimize noise, and especially to ensure such aircraft fly clear of residential and educational facilities and also where noise monitoring should be used to investigate serious concerns and devise solutions.

- *Do you have any further ideas on how the Government could incentivise the aviation and aerospace sector to deliver quieter planes?*

The UK Government have led world aviation over quieter planes by their introduction and continued use of Q.C. classification for aircraft use at night. This has now become a significant worldwide design feature for new aircraft. Maintenance of the Q.C. system will maintain this pressure on the sector for quieter aircraft.

The UK Government also contributes to ICAO and should continue to press for the new ICAO Chapter 5 standard to be adopted, and achievement of all Chapter 4 fleets at UK airports with noise problems as soon as practicable.

- *Do you believe that the regime for the regulation of other local environmental impacts at airports is effective?*

No.

- *Do you think that noise regulation should be integrated into a broader regulatory framework which tackles the local environmental impacts from airports?*

No.

We have restricted our responses to Chapter 4, and look forward to your resolution of clear policy objectives such that our members can bring their expertise to noise control and mitigation as opposed to endless adversarial discussions on criteria.

Yours sincerely,

Philip Dunbavin
Chairman
Association of Noise Consultants