



OFFICER REPORT TO CABINET MEMBER

**The Surrey County Council Response to the BAA Heathrow and BAA Gatwick Consultations on the Environmental Noise Directive: Draft Noise Action Plans (2010-2015)
16 September 2009**

KEY ISSUE/DECISION:

To agree the Surrey County Council (SCC) response to the BAA Heathrow and BAA Gatwick Consultations on the Environmental Noise Directive Draft Noise Action Plans (2010-2015) for Heathrow and Gatwick Airports.

BUSINESS CASE:

- 1 The report sets out the proposed SCC response to BAA's public consultation on its draft Noise Action Plans (NAPs) launched on 15 July 2009, for responses by 5 October 2009. The NAPs set out how BAA plans to tackle the noise impacts of their aircraft over the five-year period 2010-2015. NAPs are required to be prepared in accordance with guidance issued by the Department for Environment, Food and Rural Affairs (DEFRA).
- 2 The NAPs consider noise created by aircraft approaching and taking off from the airports, as well as noise created by taxiing aircraft and engine testing within the perimeter of the airport. They do not deal with the significant issues of noise from future expansion at either of the airports, such as the introduction of a third runway at Heathrow, a second runway at Gatwick, or changes in airspace flight paths.
- 3 Following the consultation period, BAA will consider the feedback received on each of the airports and will then submit draft noise action plans to the Secretary of State for Transport by 30 November 2009. BAA intends to publish final noise action plans early in 2010.
- 4 The NAPs broadly comply with the relevant DEFRA requirements. The exceptions are where interpretation and analysis of the basic data is required. For example, there is no identification of problems and situations that need to be improved nor are there estimates in terms of the reduction of the number of people affected (annoyed, sleep disturbed, etc) as outcomes of objectives or actions.

- 5 Both action plans include identical questionnaire surveys to be returned to the respective airport authorities. These have been completed in draft and are attached as **ANNEXES 1 and 2** to this report. They include officers' views on shortcomings in the NAP proposals.
- 6 In both action plans BAA seeks to convey the message that measured noise is improving. However, this is not necessarily recognised by local residents who have experienced increased aircraft activity at both airports in recent years. The noise action plan promises little in the way of clearly defined targets to improve this situation.
- 7 Since the questionnaire format restricts the possibility of raising wider noise issues, it is proposed that the following set of key issues, raised by the noise action plan consultations, be sent in a covering letter to BAA, along with the draft questionnaire responses at **ANNEXES 1 and 2**. These are as follows:
- The actions generally relate to procedural work that would be undertaken anyway by BAA, to meet its statutory obligations, including monitoring and consultation, rather than targeted action that is directly linked to achieving any specific objective;
 - There is no definition of "harmful exposure levels" or acceptable levels. These need to be identified and assessed against the existing situation;
 - There is no projection for noise impact in the event of future airport expansion or increase in movements;
 - The measuring and mapping of noise should be independent from aviation industry involvement. (The equivalent plans for road and rail noise are being produced by DEFRA in conjunction with the local authorities);
 - DEFRA would be better placed to assess the Action Plans against its criteria, rather than DfT which may be more focussed on transport efficiency rather than environmental impacts;
 - The Action Plans do not meet the requirements of the Regulations with regard to Quiet Areas which need to be defined according to clear criteria for designation;
 - Seeking to publish annual 6.5 night and 16 hour day LAeq contours means that the two shoulder periods (at night between 2300 and 2330 and in the morning between 0600 and 0700) are not included. Unmonitored movements of larger and noisier aircraft can therefore occur at this time, whilst allowing the airport operator to demonstrate that the 6.5 period is getting quieter;
 - Noise mitigation measures should be monitored for effectiveness and older insulation schemes should be checked to ensure that they continue to deliver the specified insulation value at a level of 35dBA as outlined in PPG24.

FINANCIAL AND VALUE FOR MONEY IMPLICATIONS

- 8 There are no financial and value for money implications.

EQUALITIES IMPLICATIONS

9 There are no equalities implications.

RISK MANAGEMENT IMPLICATIONS

10 There are no risk management implications.

IMPLICATIONS FOR THE COUNCIL'S PRIORITIES OR COMMUNITY STRATEGY/LOCAL AREA AGREEMENT TARGETS

11 There are no implications for the Council's priorities or community strategy/local area agreement targets.

SECTION 151 OFFICER COMMENTARY

12 There are no financial implications arising from this report.

CONCLUSIONS

13 Noise issues around airports are a concern for many Surrey residents. In the responses to the questionnaires (**ANNEXES 1 and 2**) and in the issues as set out in paragraph 7 to this report, SCC continues to press for more stringent controls on noise at Heathrow and Gatwick Airports.

RECOMMENDATIONS:

That the Cabinet Member agrees the key issues set out in paragraph 7 above and Annexes 1 and 2 as the response to BAA's consultations on the Environmental Noise Directive Draft Noise Action Plans (2010-2015) for Heathrow and Gatwick Airports.

REASONS FOR RECOMMENDATIONS:

These are to:

- ensure SCC's views are made known to BAA Heathrow and BAA Gatwick, and
- maintain pressure on BAA to improve the noise environment around Heathrow and Gatwick Airports.

WHAT HAPPENS NEXT:

The SCC response will be submitted to BAA Heathrow and BAA Gatwick by the consultation deadline of 5 October 2009.

Lead/Contact Officers:

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Kath Harrison, Senior Planner 020 8541 9453

Consulted: Roger Hargreaves, Head of Environment

Informed:

County Councillors representing electoral divisions within close proximity to both Gatwick and Heathrow airports.
Area Directors.

Sources/background papers:

BAA Heathrow and BAA Gatwick Consultations on the Environmental Noise Directive Draft Noise Action Plans (2010-2015) for Heathrow and Gatwick Airports;
Planning Implementation Team Briefing Note – Noise Action Plans, 23 July 2009.

HEATHROW AIRPORT LTD

BAA NOISE ACTION PLAN CONSULTATION QUESTIONNAIRE

Q1. To what extent do you think that BAA Heathrow's noise strategies outlined in the draft noise action plan are targeting the most important issues in relation to aircraft noise?

The strategy does not meet the END requirements, there is no definition of "harmful exposure levels" or acceptable levels. These need to be identified and assessed against the existing situation.

The Action Plans do not meet the requirements of the Regulations with regard to Quiet Areas which need to be defined according to clear criteria for designation. Seeking to publish annual 6.5 hour night and 16 hour day LAeq contours means that the shoulder periods are not included and will allow for unmonitored movements of larger and noisier aircraft at this time whilst allowing claims that the 6.5 hour period is getting quieter.

Q2. To what extent do you think that the draft noise action plan provides a suitable framework to manage aircraft noise?

There is no definition of "harmful exposure levels" or acceptable levels. These need to be identified and assessed against the existing situation.

There is no projection for noise impact in the event of future airport expansion or increase in movements.

Q3. The draft noise action plan proposes a number of performance indicators to measure progress in implementing the action plan. To what extent do you think that these performance indicators are sufficient?

The plan includes a Key Performance Indicator (KPI) relating to maintaining the area covered by the 55 dBA Lden, but not one that relates to the population affected. It is misleading to show the area that is covered shrinking when the population affected is increased.

Seeking to publish annual 6.5 hour night and 16 hour day LAeq contours means that the shoulder periods are not included and unmonitored movements of larger and noisier aircraft at this time can occur whilst allowing the airport operator to demonstrate that the 6.5 hour period is getting quieter.

Q4. As part of its objective to limit and where practicably possible reduce the impacts of aircraft noise, Heathrow Airport's long-term goal is to be within the top fifth of airport companies for best practice in international noise management compared to other airports of a similar size and operation. To what extent do you think that this goal is sufficiently challenging?

It is impossible to assess the nature of this goal as there appear to be no clear targets for noise reduction. Most of the KPIs relate to maintaining 2006 baseline levels.

The actions generally relate to procedural work that would be undertaken anyway by BAA, to meet its statutory obligations, including monitoring and consultation, rather than targeted action that is directly linked to achieving any specific objective.

Q5. Do you have any other comments on Heathrow Airport's draft noise action plan?

The measuring and mapping of noise should be undertaken independently of aviation industry involvement. (The equivalent plans for road and rail noise are being produced by DEFRA in conjunction with the local authorities).

DEFRA would be better placed to assess the action plans against its criteria, rather than DfT which may be more focussed on transport efficiency rather than environmental impacts.

Noise mitigation measures should be monitored for effectiveness and older schemes should be checked to ensure that they continue to deliver the specified insulation at a level of 35dBA as outlined in PPG24.

Q6. How much of the Heathrow draft noise action plan have you read or looked at?

All

Q7. The next question will allow us to classify your answers. Which of the following best describes you?

Local Government

Q8. Have you completed the survey on behalf of your company / organisation or from your own personal point of view?

On behalf of organisation

GATWICK AIRPORT LTD

BAA NOISE ACTION PLAN CONSULTATION QUESTIONNAIRE

Q1. To what extent do you think that Gatwick Airport's approach outlined in its draft noise action plan is targeting the most important issues in relation to aircraft noise?

The strategy does not meet the END requirements, there is no definition of "harmful exposure levels" or levels acceptable levels These need to be identified and assessed against the existing situation.

The Action Plans do not meet the requirements of the Regulations with regard to Quiet Areas which need to be defined according to clear criteria for designation. Seeking to publish annual 6.5 hour night and 16 hour day LAeq contours means that the shoulder periods are not included and will allow for unmonitored movements of larger and noisier aircraft at this time can whilst allowing claims that the 6.5 hour period is getting quieter.

There are limits concerning the Gatwick noise environment contained in the 2008 s106 agreement with West Sussex County Council, Crawley Borough Council and GAL. These should be referred to specifically in the NAP rather than by reference to the Gatwick website for details as in the draft NAP (page 19). Specific actions to manage these should be included in the GAL NAP (e.g. regarding engine runs and the Ground Run Pen).

Q2. To what extent do you think that the draft noise action plan provides a suitable framework to manage aircraft noise?

There is no definition of "harmful exposure levels" or acceptable levels. These need to be identified and assessed against the existing situation.

In Section 3, under Scope, the NAP states that *For the avoidance of doubt the scope of this noise action plan does not include a mitigation strategy or specific actions to deal with any new infrastructure such as a second runway or significant airspace changes.* This correctly reflects the Defra guidance but unnecessarily prompts further questions. For the avoidance of doubt, the NAP should make clear that:

- Any new infrastructure such as a second runway would be deemed a material change and in such cases the guidance requires the NAP to be revised accordingly (Defra Guidance Para 1.09).
- Significant airspace changes would fall within the remit of the Civil Aviation Authority's CAP 725, *Airspace Change Process Guidance Document*.

Q3. Gatwick Airport's draft noise action plan proposes a number of performance indicators to measure progress in implementing the action plan. To what extent do you think that these performance indicators are sufficient?

Performance indicators: the introduction of performance indicators (PIs) to measure delivery of the action plan is to be welcomed. Unfortunately, a large number of such PIs are no such thing. Some are metrics but many are items such as “publish a report” or “minutes of meetings”. For PIs to have a value they need to be seen to drive a specific action and many of those proposed do not. In many cases they are the source of the data, e.g. CDA Performance Statistics rather than the percentage compliance or trend analysis contained within the source.

The plan includes a Key Performance Indicator (KPI) relating to maintaining the area covered by the 55 dBA Lden, but not one that relates to the population affected. It is misleading to show the area that is covered shrinking when the population affected is increased.

Seeking to publish annual 6.5 hour night and 16 hour day LAeq contours means that the shoulder periods are not included and unmonitored movements of larger and noisier aircraft at this time can occur whilst allowing the airport operator to demonstrate that the 6.5 hour period is getting quieter.

Q4. As part of its objective to limit and where practicably possible reduce the impacts of aircraft noise, Gatwick Airport's long-term goal is to be within the top fifth of airport companies for best practice in international noise management compared to other airports of a similar size and operation. To what extent do you think that this goal is sufficiently challenging?

It is impossible to assess the nature of this goal as there appear to be no clear targets for noise reduction. Most of the KPIs relate to maintaining 2006 baseline levels.

The actions generally relate to procedural work that would be undertaken anyway by BAA, to meet its statutory obligations, including monitoring and consultation, rather than targeted action that is directly linked to achieving any specific objective.

The degree of challenge would be determined by the meaning of the definition “other airports of similar size and operation”, especially with the caveat of “international noise management”. Since Gatwick is often described as the “busiest international single-runway airport in the world” there would appear to be no challenge at all and certainly no aspiration for improvement. This goal should be re-stated with more meaningful figures and the degree of challenge made clear.

Q5. Do you have any other comments on Gatwick Airport's draft noise action plan?

The measuring and mapping of noise should be undertaken independently of aviation industry involvement. (The equivalent plans for road and rail noise are being produced by DEFRA in conjunction with the local authorities).

DEFRA would be better placed to assess the action plans against its criteria, rather than DfT which may be more focussed on transport efficiency rather than environmental impacts

Noise mitigation measures should be monitored for effectiveness and older schemes should be checked to ensure that they continue to deliver the specified insulation at a level of 35dBA as outlined in PPG24.

The GAL NAP mentions Chapter 4 aircraft without explaining their significance. It would be helpful to aid understanding of the import of action 1 to include the following explanation (from ICAO): “Chapter 4 aircraft are at least one third quieter than those currently certified to the Chapter 3 standard.”

Q6. How much of the Gatwick draft noise action plan have you read or looked at?

All

Q7. The next question will allow us to classify your answers.

Local Government

Q8. Have you completed the survey on behalf of your company / organisation or from your own personal point of view?

On behalf of organisation