

Overall Comment

The Council welcomes the social and economic benefits which East Midlands Airport (EMA) brings to the local community and beyond, however, the anticipated growth in both passenger and cargo flights must be inextricably linked to no growth in aircraft noise, particularly at night. The Council is disappointed to note the growth of almost 1sqkm in the area contained within the 48dB Lnight contour between 2011 and 2016 and objects to the forecast of further growth in the size of the area contained within the contour as implied in the Draft Noise Action Plan (NAP) Supplementary Information, Appendix E.

EMA proposes a number of operational and technical measures intended to lessen the noise impact of this growth in night-time operations, but it is clear from the noise forecasts that these will be insufficient to prevent further growth in noise levels in the short to medium-term.

The Council needs to be confident in the reliability and achievability of the targets and commitments set out in the NAP. In this context the long delay in the withdrawal of scheduled non-Chapter 4 compliant aircraft operations at night gives cause for concern. The Council considers that the Plan should contain a clear strategy for noise reduction which should include targets for the withdrawal of noisier non-Chapter 4 and, later, non-Chapter 14 compliant night-time aircraft operations.

The Council's comments on the detail of the Draft NAP are set out in its responses to the individual proposed actions.

Omissions from the Draft Noise Action Plan

The EU Environmental Noise Directive Annex V sets out minimum requirements for a NAP. Among these is that each action plan should contain estimates in terms of the reduction of the number of people affected by noise (annoyed, sleep disturbed or other) at the end of the Plan period. The Draft NAP omits to do so and it is considered that estimates of this should be included in the final version.

The Draft NAP omits to set out forecast growth in numbers of air traffic movements, which are needed to fully understand forecast changes in noise levels. These are set out in terms of overall numbers forecast in EMA's Sustainable Development Plan, but the Council considers that the final version of the NAP should contain separate forecasts for growth in air traffic movements during the night (11.00pm-7.00am), evening (7.00pm-11.00pm) and daytime (7.00am-7.00pm) periods.

The Draft NAP Supplementary Information document (Appendix F) contains mapping showing noise contours for the 24 hour period (Lden), night-time (Lnight) and day time (Laeq 16 hr) for 2011 and 2016. Mapping showing noise

contours for the evening period (Levening) is missing and it is considered that this should be included in the final version.

The EU Environmental Noise Directive Annex V requires that NAPs set out a long-term strategy explaining how reductions in noise, which can be harmful to health, will be achieved. The Draft NAP sets out a range of individual actions to address noise levels to mitigate impacts, but an overarching strategy for long term noise reduction is absent. The Council considers that the final version of the NAP should include such a strategy, explaining how the individual actions will contribute toward the achievement of noise reduction objectives and setting out proposed timescales for implementation.

Comments on Proposed Actions

NAP1: Noise envelope. This should be identified as a “Limit Value” to more clearly correspond with EU Environmental Noise Directive requirements. It is noted that whilst this represents a legally binding limit on the extent of night noise, there is no reason why the NAP should not set a more challenging limit to reflect technological progress and the noise limitation benefits this can bring.

NAP2: Chapter 4 operation: It is noted that despite EMA originally setting a target for the withdrawal of scheduled non-Chapter 4 compliant aircraft movements at night by 2012, these operations still accounted for 11% of night-time operations in 2016 and are forecast to account for 5% of movements in 2025. The continuing slippage in the timing of this measure is disappointing and it is considered that the NAP should set a new timescale for its early implementation. In regard to the introduction of Chapter 14 compliant aircraft operations, it is further considered that the NAP should provide greater clarity on its expectations concerning the timescales for the introduction of these aircraft for freight operations.

NAP3: Noisy aircraft penalty: Proposals to improve the accuracy of noise monitoring are supported as are proposals to reduce the maximum noise limit for departing aircraft of less than 100 tonnes from 83dB to 81dB.

NAP4: QC4, QC8 and QC16 surcharges: The introduction of a noise surcharge per QC4 aircraft for departures between 23:00 and 07:00, is supported, however, it is considered that the NAP should go further by introducing a complete ban within these hours on scheduled QC4 aircraft departures. It is also considered that the text should be amended to clearly indicate that the existing ban on scheduled QC8 and QC16 aircraft departures is to be retained. Where, in exceptional circumstances, night-time departures by such aircraft are permitted to take place, surcharges should be set at a level sufficiently high to fulfil their purpose as a deterrent.

NAP5: Review effectiveness of noise related charges: It is noted that the 2013/18 NAP proposed a similar action and it is understood that that this was not implemented.

1. Night-time operations should incur a premium: It is agreed that all night-time operations, both cargo and passenger, should incur a premium;
2. Chapter 3 aircraft that continue to operate at night should incur a premium: As stated in response to NAP2, it is considered that a timescale should be set for an early ban on night-time air traffic movements by non-Chapter 4 compliant aircraft;
3. Chapter 14 aircraft that operate at night should receive an incentive: It is understood that ICAP Chapter definitions allow heavier aircraft to make louder noise. Therefore, the incentivising of Chapter 14 aircraft may potentially have the perverse consequence of discouraging the use of quieter non-Chapter 14 compliant aircraft. It is considered that it would be more effective to relate noise charges directly to the noise levels generated by each aircraft.

NAP6: Continuous descent approach (CDA): It is noted that the 95% target for CDAs has not been met in recent years, performance having fallen to 92% since 2013. This proposed action seeks to regain and maintain the target, but bearing in mind the benefits of satellite navigation and automation technology it is considered that this target should be raised further still to 100%. The proposal to review the criteria for CDAs once the Sustainable Aviation “low noise arrival” study is complete is supported. However, it is considered that the NAP should set timescales for this action.

NAP7: Steeper approaches: The proposal to evaluate the feasibility and noise benefits of steeper approaches and, if proven, to take forward airspace change proposals, is supported. However, it is considered that the NAP should set timescales for this action.

NAP8: Specified arrival routes: It is noted that airspace changes are planned and will take place in the next five years both north and south of EMA, leading to changes in arrival routes. EMA proposes to explore the options for specified arrival routes using new satellite-based navigation technology as a means of reducing noise impacts and if proven to take forward airspace change proposals. This is supported.

NAP9: Low power, low drag approaches: Improving compliance with published procedures in this regard, including a review of operating instructions following the outcome of the Sustainable Aviation “Low Noise Arrival” work is supported. However, it is considered that the NAP should set timescales for this action.

NAP10: reduced engine taxi: No comments

NAP11: Use of aircraft ground power: No comments

NAP12: Use of intersection departures: It is noted that to reduce noise disturbance at Kegworth, aircraft taking off in a westerly direction are expected to use an “intersection departure” taking off from a point further to the west along the runway. The Draft NAP proposes to increase their use, particularly taking off in a westerly direction, at night. In the absence of data setting out the impacts on South Derbyshire residents it is not possible to draw firm conclusions in regard to this practice. It is requested that such data and accompanying analysis be provided for future reference.

NAP13: Departure track keeping: It is noted that EMA proposes to increase the departure “on-track” performance target from 90%, which is currently being met, to 98%. Bearing in mind the benefits of satellite navigation and automation technology, it is considered that this target should be raised further still to 100%. The mapping included in the Supplementary Information document Appendix D is difficult to decipher and it is requested that it be replaced by clearer versions in the final NAP.

NAP14: Explore options to improve effectiveness of Noise Preferred Routes (NPRs): The identification of priorities for changing the route and/or reducing the width of the airport NPRs to minimise people overflown as a basis for airspace change options analysis is supported. However, it is considered that the NAP should set timescales for this action.

NAP15: Continuous Climb Departures (CCD): The proposal to explore opportunities to increase use of continuous climb departures and to seek to implement airspace change as required is supported. However, it is considered that the NAP should set timescales for this action.

NAP16: Sound Insulation Grant Scheme (SIGS): The Draft NAP explains that the eligibility for SIGS starts at 55dB (night) and proposes to continue to operate the scheme. This is supported, however it is understood that homes lying within the 90dBA SEL threshold are also eligible for SIGS and it is considered that this should also be referred to in the text of the final document. It is also considered that, for information, the NAP should include mapping showing the extent of the area eligible for funding under this scheme.

NAP17: Community Fund: The proposal to continue to donate all the money raised as a result of environmental penalties to the EMA Community Fund to assist local community projects is supported. However, given that no funding has been raised in this way over the past three years, it is considered that requirements to be met by operators in order to avoid such penalties should be set at a more challenging level.

NAP18: Peak noise events report: The proposal to establish and share a new report that identifies the noisiest 10% of aircraft night operations as a basis for exploring options to reduce noise is supported in principle. However, it is considered that the report should be comprehensive, identifying the impacts of 100% of aircraft operations.

NAP19: Preferred runway direction: In the absence of data setting out the impacts on South Derbyshire residents of westerly orientated aircraft operations it is not possible to draw firm conclusions in regard to this practice. It is requested that such data and accompanying analysis be provided for future reference.

NAP20: Training flights report: The proposal to monitor and report performance to identify trends and any compliance issues and to address these as necessary is supported. It is considered that training flights should be exclusively for pilots and operators running flights to and from EMA.

NAP21: Low noise arrivals report: The proposal to review the current CDA reporting procedures in light of the Sustainable Aviation “Low Noise Arrival” work, to implement changes where agreed and to report progress is supported. However, it is considered that the NAP should set timescales for this action.

NAP22: Initiate a “Quiet Flight Performance” reporting system: The proposal to establish an airline noise performance report is supported in principle, but rather than simply measuring compliance with airport policies and procedures, should be strongly orientated toward actual noise impacts on the ground and presented in a way that can be easily understood by local communities. It is suggested that it would make sense to combine this with the comprehensive report suggested in the Council response to Draft NAP18.

NAP23: Establish a collaborative environmental management group: This proposal to bring together airline, airport and air traffic control representatives to identify root causes of common environmental impacts and to evaluate and manage potential solutions is supported. However, the NAP should clarify reporting and accountability arrangements, including the relationship of the group to the Independent Consultative Committee (ICC).

NAP24: Stakeholder reference groups: The proposal to establish such groups, which will include community representatives, to develop options for and take forward any airspace change proposals to reduce noise is supported. However, it is considered the NAP should provide clarity as to how these groups will relate to the ICC, including reporting arrangements.

NAP25: Review complaints and enquiries process: This proposal, aimed at improving the transparency and effectiveness of EMA’s enquiries and complaints handling procedure with the involvement of community groups is supported. However, it is considered that the NAP should set timescales for implementation.

NAP26: Provide an effective noise complaint and enquiries process: The continuation of the range of ways in which people can make enquiries or complaints about aircraft noise is supported. It is considered, however, that more should be done to manage the expectations of the local population, including the advance publication of schedules both for passenger and freight operations and, where possible, details of any exceptional, unscheduled operations.

NAP27: Provide effective engagement with communities: EMA's efforts to engage with local communities, including through liaison with South Derbyshire District Council (SDDC) and affected parish councils, are very much appreciated and their proposed continuation is supported. Elected Members from SDDC would wish to continue the long established practice of holding an Annual Liaison Meeting with representatives of EMA and to be invited to any presentations or consultation events that may be of relevance to them.

NAP28: Carry out regular community survey: Annual community surveys on the effectiveness of aircraft noise management and other issues and the sharing of the results with the ICC and community groups and use to inform future noise actions are supported.

NAP29: Noise related community investment: The reporting of noise related community investment is supported.

NAP30: Review effectiveness of the Community Relations Programme: The continued development of the Community Relations Programme to reflect best practice is supported.

NAP31: Provide educational and skill development material on aircraft noise: This proposal, to represent part of EMA's "Inspiring Young People" programme, is supported.