



East Midlands Airport Draft Noise Action Plan Consultation Response from Melbourne Civic Society

9th July 2018

Introduction and Management Summary

Melbourne Civic Society Committee has, over the years, observed a reluctance on the part of East Midlands Airport management to take firm actions on night noise, merely allowing night movements to increase, and waiting for operators to upgrade their fleets and thus to moderate night noise. We feel the 'hands off' ethos permeates this draft noise action plan (NAP).

The NAP conspicuously omits any reference to the increasing number of night flights and does nothing to curb the number of night flights nor to reduce the proportion of night flights.

The NAP places heavy reliance on migration of the night fleet to aircraft compliant with the latest ICAO (International Civil Aviation Authority) noise standard for new aircraft – Chapter 14. We believe that, within the NAP timescale, only large, and thus noisy freighters will be built (B767, B777 and B747) but no small/medium sized Ch14 freighters. The plan seems to us to overestimate the number of Ch14 freighters in the night fleet, and the noise benefits to be derived from them.

The NAP, if implemented as written, would remove existing night time scheduling ban on the very loudest aircraft and would allow any aircraft to operate at night.

The NAP plans to increase the number of people affected by aircraft noise, both night and day, but fails to give any forecasts of noise or number of people affected, even though such forecasts are required by the legislation.

The NAP does suggest reviews of arrival and departure routes, which could have some noise benefits to the community, but gives no timescale for these reviews. It appears that EMA management is reluctant to initiate such changes, another example of the 'hands off' ethos.

We consider that this draft noise action plan fails to address night noise, makes unrealistic assumptions on fleet upgrades, fails to address the number of night time movements, fails to estimate how many people will be affected by aircraft noise, omits certain minimum requirements of a NAP as defined by the legislation and delays any airspace changes. We recommend that the plan be redrafted to revise these shortcomings. Our detailed comments and recommendations follow.

Comments below are structured to reflect the section numbers in the draft NAP. Where we recommend changes to the NAP, these are identified as **RECOMMENDATION**.

1. Noise Action Plan

This section indicates that noise action plans are a legal requirement under EU Directive 2002/49/EC, incorporated into UK law. The EU Directive (known as Environmental Noise Directive – END) sets the objectives of noise action plans as:-

(c) adoption of action plans by the Member States, based upon noise-mapping results, with a view to preventing and reducing environmental noise where necessary and particularly where exposure levels can induce harmful effects on human health and to preserving environmental noise quality where it is good.

The objective of END, and thus of UK Law, is clearly stated as ‘**preventing and reducing environmental noise where exposure levels can induce harmful effects on human health**’, criteria true of night time noise at EMA. Section 1 of the NAP lists some mainly procedural aspects of NAPs, but omits the **objective of reducing noise** set by the EU Directive. Thus the whole balance of this NAP is switched away from the primary objective of noise reduction, and away from the noise outcomes. We consider that the NAP is unbalanced and flawed in this fundamental respect.

RECOMMENDATION. Include the objective of reducing aircraft noise at this section. Rework the NAP to recognise and define noise reduction. Include the noise outcomes of the plan for both night noise and day noise.

2. Consultation

The Consultation section is numbered 1, rather than 2.

3. The Airport

The traffic charts at p13 show data from 2006-17, while the ATM chart at p14 shows only 2013-17, thus failing to show the ATM peak in 2006-2010 caused by the increase in passenger numbers and the corresponding peak in night time noise. The charts as presented in section 3 of the NAP, obscure the known relationship between passenger numbers, ATMs and night noise.

The chart at p14 (ANNUAL AIRCRAFT MOVEMENTS BY HOUR) presenting annual hourly figures, is quite meaningless to the public; we can only assume deliberately so. Hourly figures need to be presented per day to be meaningful to the public. It is not clear why this chart shows only 2011 and 2016 data.

Section 3 (p15) does acknowledge that noise is produced by aircraft movements. The section talks of projected increases in passenger and cargo traffic (p14), but completely fails to estimate the corresponding increase in ATMs. Indeed, throughout the whole draft NAP there is no further mention of the number of aircraft movements. This lack of any consideration of the number of night time aircraft movements makes the NAP unbalanced and fundamentally flawed. This is explored in more detail in our comments on night noise at section 8.

RECOMMENDATIONS – Ensure charts showing ATMs, passenger and cargo are based on same timescale i.e. 2006-17. Alongside traffic forecasts, include ATM forecasts for both night and day flights. Show hourly aircraft movements for a day rather than a year. Include night time aircraft movements throughout the NAP.

4. Noise Mapping

No comments.

5. Noise Mapping Results

It is difficult for the layman to comment on this technical analysis. We would however raise a number of questions.

Choice of contour metrics – the END (at ANNEX VI) specifies that L_{den} and L_{night} contours be analysed in decibel value bands '50-54, 55-59, 60-64, 65-69, &>70.'. The NAP and supplementary information correctly reflect this for L_{den} , but use different contour bands for L_{night} . We believe that the night contour value bands should be based on the END specification.

Day time (L_{day}), evening ($L_{evening}$) contours. The supplementary information shows data for these as not available and shows no contour maps.

Night noise contours. We believe that the contour bands should be 50-54, 55-59, etc as indicated above.

The NAP suggests that the annual 54db contour is a close match to the airport's limit value of summer 55db contour. This is quite incorrect – annual and summer contours are quite different metrics and have different values. The NAP needs to explain the difference between annual and summer contours, and to explicitly state for each noise contour whether it is annual or summer.

The supplementary information shows the annual 54db night contour for years 2011 and 2016 as 12.7 and 12.8 sqkms and the NAP interprets this as no significant difference. This is inconsistent with other reports to ICC and to NWLDC which do show a significant increase in night noise contour between 2011 and 2016: reports to ICC MENT show the annual 55db contour rising from 9.8 to 10.6 sqkms: reports to NWLDC show the summer 55db contour rising from 11.0 to 11.9 sqkms: the latter is also illustrated in the chart at NAP Section 7 p32 which shows a distinct, noticeable increase.

We would contend that there has actually been an increase in the night noise contour, both annual and summer, between 2011 and 2016 and the claim of no significant increase made on p20, is incorrect. We cannot ascertain the source of these inconsistencies but the airport needs to do so.

RECOMMENDATIONS – Review the noise mapping L_{night} contour bands to ensure consistency with END. Review the L_{night} contour values to ensure consistency with other contour reports. Correct the L_{day} and $L_{evening}$ data in the supplementary information.

The EU directive states that a noise action plan must include:-

identification of problems and situations that need to be improved

This identification seems to be missing from the NAP. The section headed INTERPRETATION OF RESULTS the NAP does not identify any 'problems and situations that need to be improved'. In the lack of any identification of noise problems by EMA we suggest the major noise problems are: night noise, Kegworth, Melbourne and area including Wilson and Kings Newton.

The NAP does acknowledge night noise issues, stating '*The airport ... will continue to focus its efforts on limiting and reducing noise from night flights. This is the principal objective of this Noise Action Plan.*

We argue below that the NAP comprehensively fails to address this objective.

RECOMMENDATION – Clearly identify the problem areas as required by the END

6. Laws and Policies

NAP P25 – Environmental Noise Directive

The EU Environmental Noise Directive (Directive 2002/49/EC), known as END, sets out at Annex V, the minimum requirements of a noise action plan. This NAP as it stands does not reach the requirements set by END as detailed below, and therefore cannot be considered a valid noise action plan. We recommend that EMA include these missing elements in the revised plan.

Requirements from END are shown in *italics* below. This NAP does not include the following requirements:

any limit values in place in accordance with Article 5

North West Leicestershire District Council (NWLDC) has set a planning condition that the 55dB LAeq (8 hour) summer night-time noise contour should not exceed 16 sqkms. This is described in the text of the NAP as a 'Noise Envelope', but is not clearly identified as a Limit Value as END requires. This is important in view of later comments on night noise actions.

RECOMMENDATION – include a section on Limit Values and change all existing reference from 'Noise Envelope' to 'legal limit'.

long-term strategy

The EMA Development Plan forecasts night noise increasing to 2025 and decreasing thereafter. The long term strategy required in the NAP needs to clarify how the reduction in noise will be achieved, acknowledging that freighter versions of modern aircraft families are not normally built until 15-20 years after introduction of the aircraft family. It is not acceptable to simply ignore the need for a long term strategy; this is a requirement of the END. We make further comment on this in Section 8 below.

RECOMMENDATION – include a section describing long term noise strategy.

Each action plan should contain estimates in terms of the reduction of the number of people affected (annoyed, sleep disturbed, or other).

Estimates of the numbers of people affected by the actions in the plan are omitted – simply ignored by the NAP. We expect that the proposals in this plan will actually result in an increase in numbers affected by both daytime and night-time noise, and EMA have deliberately omitted this information. But this is not acceptable. It is a requirement of the END to estimate numbers affected. The plan needs to honestly estimate the noise outcomes and the number of people affected.

RECOMMENDATION – Include a section with estimates of noise outcomes and numbers affected at end of plan for both night and day noise.

NAP P25 – Chart DOWNWARD TREND IN NOISE CERTIFICATION OF AIRCRAFT

This presents noise reductions for new aircraft due to technology advances. It is very helpful in illustrating that the noise reductions from successive ICAO Chapter standards have progressively reduced, and that the reduction from Chapter4 to Chapter14 is rather modest.

In other respects we consider it is a highly misleading chart. The timescales shown apply only to **passenger** aircraft. Freighters are typically produced 15-20 years after introduction of a new aircraft type. For example: the B737-800 (Next Generation family) was launched in

1998, the first freighter version (B737-800BCF, a conversion) appeared in 2018, 20 years later; the B777 was launched in 1995, the first freighter version in 2009, 14 years later. The NAP needs to include a second version of this chart showing when freighter versions were produced for each new aircraft type and ICAO Chapter.

The NAP also fails to point out that the actual noise allowed within each ICAO Chapter standard varies according to the weight of the aircraft, so a large Ch14 may be noisier than small Ch4 (the previous standard). This is important when considering upgrades/upsizes to larger aircraft. We make further comment on this in Section 8 below.

RECOMMENDATION – Include a second version of the Chart at P25, to show when freighter versions of new aircraft types were produced. Explain that ICAO Chapter standards allow louder noise for larger aircraft and that any noise reductions apply to aircraft of similar weight.

NAP P26 – NATIONAL AIRCRAFT NOISE POLICY

UK Aviation Policy Framework

The current UK Government Aviation policy Framework makes particular note of night noise, and states at section 3.36:

'Night noise

In recognising these higher costs upon local communities, we expect the aviation industry to make extra efforts to reduce and mitigate noise from night flights through use of best-in-class aircraft, best practice operating procedures, seeking ways to provide respite wherever possible and minimising the demand for night flights where alternatives are available.'

We note that the above UK Government statement is missing from the section NAP p26. The NAP does have actions to consider best-in-class aircraft, best practice operating procedures, but makes no reference to the Government's other preferred actions – i.e. respite and minimising the demand for night flights. We believe the NAP should include actions to address these issues, or state plainly why EMA are not implementing the Government advice and expectation.

RECOMMENDATION – include section 3.36 from Aviation Policy Framework in the NAP. Bring forward actions designed to curb the number of night time aircraft movements and the proportion of night movements at EMA. Bring forward positive actions to work with industry partners to seek ways to minimise demand for night flights.

7. Noise Controls

NAP p31 – Chart NIGHT MOVEMENTS BY AIRCRAFT NOISE CHAPTER

This chart predicts over 50% Ch14 aircraft in the night fleet by 2025. This penetration level may be possible for the passenger fleet, but seems much less likely for the cargo fleets.

We understand that Boeing will continue to build a number of large freighters (B767, B777, B747) which, if built after 1 Jan 2018 must be Ch14 compliant. However we believe that, within the timescale of the NAP there are no plans by Boeing or Airbus to build freighter versions of the Ch14 aircraft identified in the chart at Page 25 – B787, B737MAX, A350, A320neo. Instead, smaller freighters will be conversions from old Ch4 passenger aircraft, which we assume will not be Ch14 compliant.

It is far from clear that the assumed level of Chapter 14 night flights can be achieved for the freighter fleets. To justify the assumptions at p31, the NAP needs to clarify the availability Ch14 compliant freighters – which new build will be Ch14, whether any converted Ch4 passenger aircraft will be Ch14 compliant, and which (if any) freighters already in the current night fleet may be reclassified as Ch14 (but with no additional noise benefit).

It is also far from clear that noise benefits assumed for Chapter 14 can be achieved. It seems to us that the only CH14 freighters available in the plan timescale will be large or very large; freighter upgrades may actually be upsized to larger, noisier aircraft and may not automatically achieve noise reductions.

The chart at p31 is also misleading, in that it is named 'Night Movements', but is designed not to show the number of movements, merely postulated proportions. It is not possible to have any meaningful debate on night noise without the forecast number of movements. We ask that the forecast number of night movements be included in this NAP.

RECOMMENDATION –

- Define which freighter aircraft from new build, conversions and any already in the current fleet will be classified as Ch14 compliant.
- Modify Chart at NAP p31 to show numbers of night time aircraft movements and proportions by ICAO Chapter based on clear freighter availability.
- Reassess potential noise benefits from Ch14 aircraft on the basis of defined availability.

NAP P32 Chart PERFORMANCE AGAINST AGREED NOISE ENVELOPE

We note again that the chart at P32 shows a significant increase in night noise contour between 2011 and 2016, inconsistent with the statement at Section 5 p20. This internal inconsistency undermines the credibility of the NAP. We have previously argued (section 6) that 'noise envelope' is a misnomer. It is a limit value and should be identified as 'legal limit'.

RECOMMENDATION – change Section 5 p20 to reflect the increase in night noise shown here. Change chart title to Legal Limit.

NAP1: Noise envelope – The 'noise envelope' is actually a Limit Value, defined as a planning condition, and should be stated as such (see comments in section 6). The NAP specifically states that no action will be taken to stay within the legal limit, so this is actually a **non-action**. We do not consider that this can be validly counted as an action, only a Limit Value.

RECOMMENDATION – remove this action – include it in a section on Limit Values as required by the regulations.

NAP 2: Chapter 4 operations – This objective was set in 2006 with a target date of 2012, and is now 6 years overdue. We consider this an example of EMA's propensity to avoid firm action on night noise – whatever action was taken has not been effective. If the remaining upgrades from Ch3 to Ch4 will result in a genuine noise reduction, then we suggest that a night scheduling ban for Ch3 aircraft be introduced in the near future.

RECOMMENDATION – Introduce a night scheduling ban for Chapter 3 aircraft.

8. Night Noise

This section displays a disappointing lack of ambition. The actions proposed do not seem effective to us and there is a complete absence of any consideration of the number or the proportion of night time aircraft movements.

Number of night flights. Section 3 of the NAP clearly defines that the main drivers of night noise are the number of flights, and the noise from each flight. However the rest of the NAP omits any reference to the number of night flights and to forecast increases. It is not possible to have a sensible debate about night noise without considering flight numbers. We consider the NAP is fundamentally flawed in this respect and we can only assume deliberately so.

Proportion of night flights. Section 3 of the NAP states that a third of ATMs at EMA take place at night, (a far higher proportion than any other UK airport), and the airport's separate 2015 Development Plan makes the bland and completely unjustified assumption that this proportion will remain the same throughout the period of development plan (to 2040). This is not stated in the NAP, and there is a total lack of action to reduce the proportion of night flights. We believe this is a deliberate abrogation of responsibility by EMA.

We would expect EMA to be actively working with Government and aviation industry partners to seek ways of reducing the demand for night flights as required by the current UK Aviation Policy Framework (see comments in Section 6). We would also expect Manchester Airports Group (MAG) to use their position on the Sustainable Aviation Group (SA) to influence aviation policy away from night flights and to modify the SA Noise Road Map to specifically discourage night noise. We expect EMA to actively pursue actions to reduce the proportion and number of night time movements.

RECOMMENDATIONS – Include in this NAP forecasts and full information on the number of night flights. Bring forward actions in this NAP to:

- Work with Government and industry partners to reduce demand for night flights.
- Use the MAG position on Sustainable Aviation to develop aviation policy to discourage night flights
- Reduce the proportion and the number of night flights at EMA.

NAP P32 – Chart PERFORMANCE AGAINST AGREED NIGHT NOISE ENVELOPE

This charts shows night noise increasing and reducing from 2025, suggesting:

'Whilst forecasts indicate some growth in the contour area in the next few years, in the longer term the transition to quieter Chapter 14 aircraft is forecast to return the contour to today's levels and then further to reduce its size.'

It does not seem credible that the forecast noise reduction after 2025 can be achieved merely by the introduction of Ch14 aircraft. The chart at P25 of the NAP shows rather modest noise improvements for Ch14 aircraft, and the EMA 2015 Development Plan forecasts a continuing increase in night time movements – an increase unstated and apparently ignored by this NAP.

It is entirely unrealistic to claim that, alongside the forecast increases in aircraft movements, the night contour size will be reduced simply by Ch14 aircraft, even if Ch14 freighters were available.

In our view, such a reduction would require the average noise of night time movements to fall by far more than is delivered by the Ch14 standards, and could only be achieved by deployment of 'ultra-quiet' aircraft of the type envisaged in the Sustainable Aviation Noise Road Map, or by fewer aircraft movements. There is no sign of 'ultra-quiet' aircraft, and the fewer night movements requires EMA to modify its development plan and to take strong action to curb night flights. It is far from clear how the postulated reduction in night noise contour can be achieved. The long term strategy section, required by the legislation, needs to give a credible explanation of how the claimed noise contour reduction can be achieved.

RECOMMENDATION – Include a section on long term noise strategy, as required by the legislation, giving a realistic and honest assessment of how the claimed night noise contour reduction can be achieved.

NAP 3: Noisy aircraft penalty – We do realise that EMA has invested considerable effort in reviewing this action, and we do not challenge that work. It does however seem odd that the more stringent criteria will be applied to smaller aircraft which are in any case less noisy – this may not be highly beneficial for the community. We are unconvinced that this revised penalty scheme will be effective in reducing noise.

NAP 4: QC4, QC8 and QC16 surcharges – Previously EMA has applied a night scheduling ban for QC8 and QC16 aircraft. These aircraft would only be allowed at night in exceptional circumstances, with permission from airport management and on payment of a surcharge. This modified action applies only a surcharge to all three categories (QC4, 8 & 16) with no mention of a night scheduling ban for any of these categories. If implemented as written, this action would appear to remove the night scheduling ban, meaning that an airline can choose to fly any aircraft at night, no matter how noisy without restriction, requiring no permission from airport management. As stated, this a retrograde and thoroughly deplorable action.

We are pleased that, at the ICC General meeting on June 15th 2018, airport management made a commitment that there is no intention to relax the stringency of existing restrictions. We must assume therefore that the wording of this action is a drafting error, and we expect that the current night scheduling ban on QC8 & 16 aircraft will be retained and explicitly stated.

The night scheduling ban should be extended to QC4, ensuring that noisy aircraft such as B747-400 and DC-10 cannot be introduced into the night fleet, thus giving some reassurance to the airport communities. These aircraft would then only be allowed to operate at night in exceptional circumstances to be agreed by airport management and be subject to a surcharge.

The suggested surcharge for QC4 seems low, similar to normal charges. It seems EMA have again opted for a rather weak action. Rather than introduce a lower surcharge as EMA propose, we consider surcharges of £5,000, £10,000 and £15,000 for QC4, 8, and 16 respectively be charged.

As far as we are aware there are no QC4 aircraft in the current scheduled night fleet, so the comments referring to a phased introduction of QC4 surcharges seem irrelevant and misplaced – unless there are imminent plans to introduce QC4s to night operations – a move which should not be countenanced. A night scheduling ban for QC4s should be introduced without delay.

RECOMMENDATIONS –

- Reword NAP4 to make the continued night scheduling ban on QC8 and QC16 explicit
- Apply a night scheduling ban to QC4 aircraft
- Apply surcharges of £5,000 £10,000 and £15,000 to QC4, 8, 16 respectively for night movements, allowed only in exceptional circumstances.

NAP 5: Review effectiveness of noise related charges – A similar action was included in the 2013/18 Noise Action Plan at NAP15 to be completed in 2015/16, but was not done. Is this current action any more likely to be completed? We would make the following comments.

- 1 **Night-time operations should incur a premium** - Agreed. As stated this action applies a premium to all night operations, both cargo and passenger movements. We agree with this. We expect that EMA will not step back from this action.
- 2 **Chapter 3 aircraft that continue to operate at night should incur a premium** – We have previously suggested that Ch3 aircraft should be subject to a night scheduling ban after an agreed date.
- 3 **Chapter 14 aircraft that operate at night should receive an incentive.** This should be applied with great caution. Ryanair is already upgrading to B737MAX – a Ch14 aircraft for commercial reasons; do they need incentives to operate these at night? We believe that the only Ch14 freighters in the NAP timescale may be large aircraft – is it wise to incentivise operation of the largest and noisiest aircraft types? This would seem counter-productive and would not be considered sensible by airport communities.
An alternative approach would be to define freighter weight bands for which Ch14 aircraft are available, and for these weight bands, apply a night scheduling ban on aircraft not Ch14 compliant. This would be consistent with the Government advice to use ‘best-in-class’ aircraft and any action less than this will not ensure ‘best in class’ aircraft at night.

We question the assumption in the NAP that upgrades to Ch14 aircraft will automatically bring noise reductions when the upgrade is an upsize to a larger aircraft. As an example, we believe there will be no direct Ch14 equivalent for the current B757 freighters. A recent paper to ICC (Aircraft Fleet Changes and Charges, MENT 19th May 2017) seems to indicate replacement of the B757s (Ch4, QC1) by B767s (Ch14, but QC1 or 2). So it seems upsize to later, but larger aircraft may not actually result in noise reductions. Indeed, depending on the specifications and weights, there may be increased noise. We feel EMA needs to review the simplistic assumption of automatic noise benefits from Ch14 aircraft, and take into account aircraft upsizing.

ICAO Chapter definitions allow different weight aircraft to make louder noise. Incentives based on Chapter number may lead to somewhat perverse consequences e.g. rewarding very loud aircraft. Rather than base noise related charges on ICAO Chapters, we believe it would be more sensible to relate noise charges directly to noise levels generated by an aircraft.

RECOMMENDATIONS –

- The night premium should apply to all aircraft movements, cargo and passenger as stated in NAP5
- Noise premium should be related to the noise generation of each aircraft
- Define weight bands for which Ch14 aircraft are available and introduce a night scheduling ban on non-Ch14 aircraft
- Review assumptions on Ch14 upgrades and upsizes

9. Arriving Aircraft

General comment on airspace changes. The actions involving some element of airspace changes (NAP 6, 7, 8, 14 and 15) are, in general, welcome. There may be some opportunity for noise improvements. However we have heard arguments by EMA Management at ICC meetings, that airspace changes at EMA cannot be undertaken before wider implementation of new navigation technology, to an as yet unspecified timescale, perhaps several years. We remain unconvinced that the very local airspace changes suggested in this NAP cannot be initiated independently by EMA, and the NAP fails to give any reason for delay. This may be viewed as yet another example of EMA management deciding to do as little as possible. We recommend that these actions have timescales and targets in the NAP.

NAP 7: Steeper approaches – Investigation of steeper approaches is a welcome initiative. This may bring small noise reduction, and may be particularly beneficial for Kegworth.

NAP 8: Specified arrival routes – A review of the arrival routes is welcome. We would ask that investigation of curved approaches be included. This could be beneficial for Melbourne and Kings Newton in westerly approaches.

We are concerned that there is no timescale for actions NAP7 and NAP8. We consider this again reflects EMA's propensity towards no action. We would urge that EMA sets targets for these initiatives.

RECOMMENDATION – Set timescales/targets for NAP7 and NAP8. Include curved approaches in NAP8.

10. On The Ground

We have no comments on ground noise.

11. Departing Aircraft

NAP 13: Departure track keeping – Increase track keeping to 99%. This action is entirely insufficient. The existing NPRs are 3km wide swathes and, on the SW departure route this action means that 99% of departures will still be allowed to fly over Wilson and parts of Melbourne, so this does nothing to alleviate public concerns on track-keeping.

NAP 14: Explore options to improve the effectiveness of NPR's – We welcome this action, but are very concerned by the lack of timescale. Our members have indicated a desire for the SW NPR to be concentrated along the centre line, thus avoiding overflying of Wilson and Melbourne. We understand that the new navigation technology has been introduced at other airports, and do not understand why it cannot be introduced at EMA. We consider it unacceptable that aircraft will continue, for several years, to be allowed to overfly Wilson and parts of Melbourne when the technology to avoid this is available.

NAP 15: Continuous Climb Departures (CCD) - We welcome the initiative to re-examine NPRs and departure procedures. However as with NAP 7 & NAP 8 we regret the lack of any timescale and urge that timescales be set.

RECOMMENDATION – Set timescale/targets for NAP14 and NAP15. Review the SW departure route with some urgency.

12. Mitigation and Compensation Schemes

NAP 17: Community Fund – The airport will continue to donate all the money raised as a result of environmental penalties to the Airport Community Fund. This is a laudable though perhaps rather hollow commitment – revenue from environmental penalties has been zero for the last 3 years (2015-17).

13. Monitoring and Reporting

The following actions NAP18-31 represent almost half of the claimed actions in the NAP, but have no effect on noise: it may be argued that some of these are included simply to boost the action count.

General comment on Monitoring and Reporting – the actions do not consistently indicate to which body or bodies the reports will be submitted. Who will monitor these reports?

NAP 18: Peak noise events report – We welcome this initiative. It would be helpful to clarify where the report will be used (ICC?), and acknowledge that this may lead to revision of actions in this NAP. 10% of noise events may be too many, but the details may be refined by ICC.

NAP 19: Preferred runway direction – We agree with this.

NAP 20: Training Flights Report – We welcome this initiative.

NAP 22: Initiate a ‘Quiet flight performance’ reporting system – This proposed report attempts to amalgamate a series of desirable, technical operating techniques, internal to the aviation industry. To produce a single composite indicator would require a rather complex and arbitrary weighting system. We feel this will result in an arcane, inward looking report, which is likely to be meaningless to the community and is dissociated from actual noise on the ground. It could lead to somewhat anomalous results, e.g. a fleet operating large aircraft could score very well on the criteria, potentially win an annual award and yet be very noisy and intrusive on the ground. This would appear nonsensical to the community. We would suggest that criteria for the award be strongly biased towards reduction of actual noise on the ground, and should eliminate any fleet which increases aircraft noise year on year.

RECOMMENDATION – Base the quiet flight performance on reduction of noise on the ground.

NAP 23: Establish a Collaborative Environmental Management Group – This is a new and unknown group to us. There is no clarity on the accountability nor working processes. The objectives ‘*to focus on identifying the root causes of common environmental impacts and to evaluate and manage potential solutions*’ are rather vague and woolly. Significantly there is no objective here to actually **REDUCE** any environmental impacts. We suspect therefore that there is no intention or will to reduce the environmental impacts, and this group may simply become an internal ‘talking shop’. If the remit were changed to reduce the environmental impacts, we may have more faith in the concept of this group.

14. Effective Communication

NAP 24: Stakeholder reference groups – In principle this seems to be a useful initiative. It is not clear how the groups would relate to the existing ICC, nor is there consistent mention of the groups in actions relating to airspace changes. In the lack of any schedules for airspace changes, it appears these groups will be virtual, non-functional for some years.

NAP 25: Review complaints and enquiries process

NAP 26: Provide an effective noise complaint and enquiries process

NAP 25 and 26 appear to us to be the same action, and seem to be separate simply to boost the action count

NAP 27: Provide effective engagement with communities

NAP 28: Carry out regular Community Survey

NAP 29: Noise related community investment – This sounds like part of NAP 17. We are not aware of the airport 'Community Investment Report'.

NAP 30: Review effectiveness of the Community Relations Programme – surely review of effectiveness is a necessary part of the existing NAP27. Again, it seems as if these are separated to boost the action count.

15. Noise Outcomes

The NAP fails to define noise outcomes and numbers of people affected either by night noise or day noise by the end of the plan. The NAP fails to assess the noise outcomes against the objectives identified in the noise mapping results at Section 5.

RECOMMENDATION – Include noise outcomes for both night noise and day noise. Include an assessment of the achievement of objectives to be identified at Section 5.

*Dr P M Grimley
Chairman, Melbourne Civic Society
9th July 2018*