

SAVE Response to the East Midlands Airport Draft Noise Action Plan 2024-2028

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1. Introduction

SAVE is a community and environmental group formed by the villages of Aston-on-Trent and Weston-on-Trent, 5km northwest of the airport. SAVE welcomes the opportunity to comment on this draft Noise Action Plan and we recognise that East Midlands Airport is an important part of the local economy. The noise issues covered by the draft NAP are important to the residents of Aston & Weston. Night time noise and noise from training overflights are our biggest issues.

2. Summary

We have reviewed the draft NAP in detail and compared it to the previous NAP covering the five year period from 2019 to 2023. The plan includes some good points but, overall, we find that the plan lacks detail and does not contain the clear objectives and measurable targets which would allow proper evaluation at the end of the five year plan period. It is likely that we would reach 2028 still with no measurable improvements, either met or missed. Steadily rising noise levels would then need to be addressed by a follow-on plan, which would need to address the same issues as this one. In our view, the draft needs some work to turn it into a viable plan. In particular, “ongoing” appears as the deadline for over half of the actions; this is not a plan. We have made suggestions in the comments below on items that we would like to see included in the plan.

3. Comments on Chapters 1 to 7

Chapter 3 and the NAP informational video show that EMA have long-term expansion plans which will significantly increase air traffic. Passenger numbers will more than double and freight will also increase by 75%, leading to an estimated 112,600 aircraft movements per year by 2040. That is one aircraft movement every 5 minutes. Assuming the current 55%/45% day/night split, this increases to one every 3 to 4 minutes throughout the night. Unless both peak and average noise levels are significantly reduced, this level of traffic will result in an intolerable noise nuisance. 2040 is not far away (two full noise action plans after this one) so this NAP needs to clearly show how noise levels will be managed down as expansion progresses.

Chapter 5 shows the results of noise mapping. Figures 2 & 3 on page 18 shows Annual L_{day} contour areas largely unchanged over a 10 year period and the annual L_{night} contour areas increasing over the same period. Figure 4 on page 19 shows the number of people within the 48dB L_{night} contour area steadily increasing since 2006. Fig 12 on page 38 shows noise forecast to increase until 2025 and then to start to reduce, through to 2040.

EMAs idea seems to be that newer, quieter aircraft will lead to a reduction in noise. Fig.8 on page 25 illustrates this, but freighter aircraft are not shown and there is no projection past 2020. Also, the downward trend in aircraft noise seems to be levelling off from Chapter 4 to Chapter 14 aircraft. Most importantly, there is no timetable for the phasing out of Chapter 4 and the introduction of Chapter 14 aircraft.

Taken together, the increase in air traffic, the short-term increase in noise and the lack of clarity on quieter aircraft introduction do not add up to a credible long-term strategy. The NAP needs to show that growth can be managed while still delivering a year-on-year reduction in noise.

Chapter 7 deals with the Future Airspace initiative. Several aspects of the plan are dependent on the outcome of the Future Airspace project. We understand that this is due to go out to public consultation early in 2025, so will not be implemented until well into the five year NAP period. It would be useful to have a mid-term update to the NAP when the Future Airspace outcomes are understood, so that scheduling of Future Airspace actions can be checked.

4. Comments on the NAP Consultation Questionnaire

Chapter 8 - Noise controls

Are the actions we have identified in Chapter 8 “Noise controls” adequate? No.

NAP1: Preferred runway direction. This is a new action but the preferred runway policy has been in operation for many years so it represents business as usual rather than a new initiative. The Expected Outcome / Benefit is incorrect. The 5 knot tailwind rule means that more aircraft take off on Runway 27 than would be expected base on wind direction alone, leading to more noise for communities to the west of the airport. The number of aircraft movements does not change, so the preferred runway policy does not minimise noise in the 55db L_{den} contour area, it just moves the contour.

The action here should be to review the preferred runway policy as part of the Future Airspace programme to see if it is still needed when new flightpaths are introduced.

Chapter 9 - Arrivals

Are the actions we have identified in Chapter 9 “Arrivals” adequate? No.

NAP2: Continuous descent approach. NAP6 in the 2019-2023 NAP had a CDA target of 98% by 2023. We now have a target of 95% by 2028, rising to 98% after the introduction of the Future Airspace programme. The action should be to understand the reasons for the delay and alter the strategy.

NAP3: Specified arrival routes. Not clear what this action means. The Future Airspace design envelopes show aircraft turning on to a final ILS approach 5nm out from the runway threshold, so will make little difference to communities close to the airport. This is linked to Future Airspace which is estimated to go out to public consultation early in 2025, so unlikely to have a significant benefit during the coming 5 year plan period.

NAP4: Low power, low drag approach. As with NAP2, this is carried forward from the 2019-2023 plan. What was the outcome of the 2019 “Low Noise Arrival” work and what is the new action?

Chapter 10 - On the ground

Are the actions we have identified in Chapter 10 “On the ground” adequate? No.

NAP5: Reduced engine taxi. Not a significant issue in Aston or Weston, so no comment.

NAP6: Review effectiveness of ground noise procedures. Not a significant issue in Aston or Weston, so no comment.

NAP7: Engine testing. Not a significant issue in Aston or Weston, so no comment.

NAP8: Use of aircraft ground power. Not a significant issue in Aston or Weston, so no comment.

NAP9: Use of intersection departures. This has a similar impact to NAP1. Using an intersection departure means that departing aircraft will be lower over communities to the west of the airport. This will lead to more noise for communities to the west of the airport. The number of aircraft movements does not change, so this policy does not minimise noise, it just moves the contours westwards.

This is also mentioned as a noise reducing procedure for Departing Aircraft in Ch11. on page 47, but there is no specific action. Aston & Weston have a noise problem with certain aircraft when they accelerate to full power at the start of take-off in an easterly direction. The use of intersection departures would reduce this noise, but would lead to more noise for communities to the east of the airport.

As with NAP1, the action here should be to review the intersection departures policy as part of the Future Airspace programme to see if it is still needed when new flightpaths are introduced.

NAP10: Night time vehicle noise. Not a significant issue in Aston or Weston, so no comment.

Chapter 11 - Departing aircraft

Are the actions we have identified in Chapter 11 “Departing Aircraft” adequate? No.

NAP11: Departure track keeping. The target of 98% “on-track” departures is carried forward from the 2019-2023 NAP. As air traffic grows, 2% “off-track” departures becomes a bigger number, increasing to 3 a day by 2040. We would like to see a % target that reduces with time so that the real number of “off-track” departures continues to fall. Ideally to zero by the end of the plan period, following the introduction of the Future Airspace programme.

The maps on page 98 (Appendix E – Arrival and departure maps) appear to show aircraft concentrated to the right of the centreline of the 27 Trent NPR. While these aircraft are “on-track”, this concentration will result in more noise for Aston & Weston. We would like to see a measure of the distribution of aircraft across the NPR so that anomalies like this can be corrected.

NAP12: Explore options to improve the effectiveness of NPRs. This is a good idea, but it is dependent on completion of the Future Airspace initiative. This is estimated to go out to public consultation early in 2025, so unlikely to have a significant benefit during the coming 5 year plan period. It is difficult to see what the real action is here.

NAP13: Continuous climb departures (CCD). See comment on NAP12.

NAP14: Off-track departure fines. This is a good initiative, but monitoring needs to show that non-compliance is reducing. A good action would be to have the need for off-track departure fines reducing year-on-year. A good target would be that non-compliance continues to fall progressively to zero by the end of the five year plan period.

NAP15: Noisy aircraft penalty scheme review. Applying the scheme during the day is a good idea. But again, monitoring needs to show that non-compliance is reducing, otherwise the scheme needs to be modified.

Chapter 12 - Night noise

Are the actions we have identified in Chapter 12 “Night noise” adequate? No.

NAP16: Noisy aircraft penalty. Fig.20 on page 54 does not show a falling trend in violations and a review with a deadline of “ongoing” is not going to change this. A better action would be to review violations annually and increase the penalty to ensure a year-on-year reduction, ideally to zero by the end of the plan period.

NAP17: Review effectiveness of noise related charges to incentivise the use of ICAO Chapter 14 compliant aircraft at night. Incentivising the use of ICAO Chapter 14 compliant aircraft at night is a good objective, but a review in 2026 is not an effective way of achieving it. The proportion of Chapter 14 aircraft at night should be reviewed annually and the noise related charges adjusted to ensure a falling trend. A regular annual review of all charges and penalties will give EMA a clearer idea of what works and the level of charge / penalty needed to achieve a particular outcome.

NAP18: Operational ban on QC4, QC8 and QC16 rated aircraft at night. NAP4 in the 2019-2023 NAP maintained the then existing ban on QC8 & QC16 operations at night. Also, the last QC4 rated aircraft has been removed from night operations. The effect of this action is to ban the re-introduction of QC4 operations at night, which is not very ambitious for a five year plan. The 2019-2023 NAP introduced a new noise surcharge for QC4 aircraft, so perhaps this plan should introduce a new surcharge for QC2 aircraft to prepare for a QC2 ban in the next NPA. Alternatively, a surcharge also applies to Chapter 3 aircraft, so perhaps the plan should set a date for a ban on Chapter 3 aircraft operating at night. As it stands, there is nothing in this action that can be measured in 2028 which will show that a significant objective has been met (except perhaps that there are still no QC4 night operations in 2028).

NAP19: Night noise envelope. It is not clear what this action is intended to achieve. The area of the 55dB L_{Aeq} summer night-time noise contour is well below the 16km² limit, so this action has no impact on night time noise. A better action would be set dates to progressively reduce the limit to say, 14km² by 2030 and to 12km² by 2040 to provide some meaningful control.

NAP20: Chapter 4 operation. Noise charges have recently been reviewed as part of the 2019-2023 NAP. A deadline of “ongoing” for another review is meaningless. A better action would be to annually review the number of night operations which do not meet Chapter 4 and to increase charges to make sure that the trend is reducing. Fixing a date for a ban on Chapter 3 aircraft would also help.

Chapter 13 - Training flights

Are the actions we have identified in Chapter 13 “Training flights” adequate? No, but actions on training flights are new to the NAP and are welcome.

NAP21: Training flight report. Monitoring and reporting of performance on training flight exclusion areas is welcome to ensure continued compliance. The action deadline of “ongoing” is vague. We would prefer to see an annual report to the ICC with the report published on the EMA website and in the Community Flyer e-newsletter.

NAP22: Management of training flights. This action will provide some certainty for local residents and is welcome. We assume that compliance will be 100%, but compliance should be reported under NAP21.

NAP23: Review of training flight procedures. This is a good idea, but given that these procedures are relatively new, there should be a way for local residents to contribute to the review.

Chapter 14 - Mitigation Schemes

Are the actions we have identified in Chapter 14 “Mitigation schemes” adequate? Yes.

NAP24: Sound insulation grant scheme. Not relevant to Aston and Weston, so no comment.

NAP25: Improved Sound Insulation Grant Scheme eligibility and grant value. Not relevant to Aston and Weston, so no comment.

NAP26: Sound Insulation Grant Scheme technologies. Not relevant to Aston and Weston, so no comment.

NAP27: Community Fund. These are well thought out changes.

Chapter 15 - Monitoring and recording/reporting

Are the actions we have identified in Chapter 15 “Monitoring and recording/reporting” adequate? No.

NAP28: Community Monitoring. This is a good initiative.

NAP29: Independent assessment of community noise environment. More thought should be given to how monitoring results are communicated. Results should be communicated to community groups and Parish Councils and published on the EMA website and in the Community Flyer e-newsletter. The action should be to review the communications strategy with the ICC.

NAP30: “Quiet Flight Performance” reporting. Useful only if the reports are followed-up and acted on, and it can be demonstrated to reduce noise. Another “ongoing” which needs to be sharpened up.

NAP31: Identify smarter ways to work with industry partners in reducing noise. This should be business as usual in any large organisation and should not need an action. This is another “ongoing”, so if it is to be included then an annual review is needed to demonstrate that it is having a positive effect.

Chapter 16 – Effective Communication

Are the actions we have identified in Chapter 16 “Effective Communication” adequate? No.

NAP32: Provide and regularly review effective engagement with communities. Community engagement is often seen as PR, pushing a positive view but with no real engagement with people’s concerns (e.g. Aston Well Dressing). Real engagement would be welcome, but would need to be well publicised.

NAP33: Carry out regular community survey. Good, but the results would need to be widely published.

NAP34: Noise related community investment. This is a good initiative.

NAP35: Provide educational and skill development material on aircraft noise. This is a good initiative.

NAP36: Noise Action Plan Progress Report. Good, but to be effective the NAP must have clear objectives and measurable outcomes.

NAP37: Online Noise Portal for local communities. Good. This needs to be informative, impartial, well designed, easy to use and well communicated. EMA should consider having this independently produced.

Complaints

NAP38: Continually improve noise complaint and enquiry process. Many residents of Aston & Weston think that there is no point in complaining about noise because nothing will change. EMA should consider having an independent review of the complaints procedure to feed into NAP39. The re-designed complaints process should then be independently run.

NAP39: Develop and publish noise complaints policy. See NAP38.

Further information

We wish to be identified in the Schedule of Responders

We would like to subscribe to the Community Flyer e-newsletter, using the following e-mail address:

secretary@saveastonandweston.uk

Diversity Monitoring – SAVE is a multi-member organisation.