

**From:** [REDACTED]  
**To:** [Manston Airport](#)  
**Subject:** Comments on Second draft DCO  
**Date:** 19 June 2019 17:52:11  
**Attachments:** [East Midlands Airport"s Environmental Management System.rtf](#)

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FROM: Chris Lowe Interested party: 20014275

Dear ExA,

I have comments on parts of the **Second draft DCO** and I hope I am in time for these points to be included in your imminent Fourth Written Questions.

#### Noise

The Aviation Policy framework (APF) says:

"**3.3** We want to strike a fair balance between the negative impacts of noise (on health, amenity (quality of life) and productivity) and the positive economic impacts of flights. As a general principle, the Government therefore expects that future growth in aviation should ensure that benefits are shared between the aviation industry and local communities. **This means that the industry must continue to reduce and mitigate noise as airport capacity grows.** As noise levels fall with technology improvements the aviation industry should be expected to share the benefits from these improvements. "

Hence the DCO needs to include a requirement to implement this, to ensure that such benefits take place and that they are shared with local communities.

I suggest that the easiest way to do that is to provide targets of reduced noise to be achieved over five year periods, so each subsequent quinquennium will have a lower noise target.

In addition, to cater for the fact that Manston is a new airport, the first reduction would not occur until five years after start of operations, with subsequent reductions in five years later etc..

Also as part of the 'sharing with local communities', if the Quota Counts in the relevant five year period are less than what would be allowed for in the subsequent quinquennium, then the new target will become the actual Quota Counts of that previous quinquennium.

In this way the airport could achieve the 'continual improvement' required by the APF.

I therefore propose a new paragraph:

"*To enable the local communities to share the benefits of less noisy aircraft being introduced, and to encourage the use of such aircraft, the permitted annual Quota Counts shall be reduced by 10% every five years. The first reduction shall take place five years from the start of aircraft activities. Where the actual usage in the past five years is less than 90% of the Quota Count, then that actual Quota Count shall be used for the next five years "*

#### Environmental Management Systems (EMS)

As well as noise, the other environmental impacts of the airport need managing.

In the case of ISO 14001, the Environmental Management System, requires organisations to demonstrate an improvement in environmental performance. This means that an organisation has to identify its impacts and then implement systems to manage and reduce them over time. The associated BS EN ISO 14031 sets out a process to help an organisation improve environmental performance. It provides a set of tools to identify, measure, assess and communicate environmental performance using key performance indicators (KPIs), based on reliable and verifiable information.

These standards provide powerful tools for organisations, giving them a means to track their progress towards a more circular and sustainable economy.

Interestingly, East Midlands Airport achieved ISO 14001 certification in 2002 (see attached) and by ensuring that the annual reports from the EMS are submitted to the Airport Consultative Committee and the local

authority, this scrutiny should ensure that improvements are made.

Even better would be to require achievement of **ISO 14001, OHSAS 18001 and ISO 9001**, the 'gold standard', providing triple certification for management systems for environment, health and safety, and quality, and they ensure that all these are monitored and improved.

My own experience, as the lead manager at Kent & Canterbury Hospital, implementing the first ISO 14001 certification for a hospital in England in the 1990's, showed huge benefits in reducing resource use, improving staff training and communications, and greatly reducing risks of damaging incidents.

Hence I recommend that these are made a requirement in the DCO, to ensure good practice is embedded in the organisation, and also to help establish and maintain good relations with the local communities.

The second dDCO should therefore be further amended with a new paragraph, using purple:

"As soon as the authorised development starts operations, it must be assessed and certified to the **ISO 14001, OHSAS 18001 and ISO 9001** standards, and these standards must be maintained for the life of the authorised development. "

This could be included on page 39, under "*Operation environmental management plan*", with 7 (1) being amended by replacing 'operation environmental management plan' being replaced by:

"environmental, health and safety and quality management systems certified to **ISO 14001, OHSAS 18001 and ISO 9001**".

The '*Noise mitigation*' section on page 41, could also be amended with a new 9 f:

9f. As soon as the authorised development starts operations, it must be assessed and certified to the **ISO 14001, OHSAS 18001 and ISO 9001** standards, and these standards must be maintained for the life of the authorised development.

### Noise insulation

The new paragraph 9b: which says: "**9b.** Residential properties with habitable rooms within the 60dB LAeq (16 hour) day time contour will be eligible for noise insulation and ventilation detailed in Noise Mitigation Plan", only refers to insulation for those houses within the 60 dB LAeq (16 hr) day time contour.

Although most of these properties would also be affected by excessive night time noise, there would also be additional houses affected at night, because new paragraph 9d refers to:

"**9d.** The area enclosed by the 50dB(A) Leq16hr (0700-2300) contour shall not exceed 35.8 sq km, and the area enclosed by the 40dB(A) Leq8hr (23.00-07.00) contour shall not exceed 47.4 sq km".

Hence an additional paragraph is needed to provide insulation for those not covered by 9b. This is needed to provide insulation for those within the 40 dbA Leq 8hr contour area. It is especially important that people can sleep with windows wide open as that is the period when daytime heat be can 'let out' by such ventilation, and thus avoid the house becoming hotter and hotter. This 'open window' situation means that the 40 dBA contour must be used, as there would be less attenuation from the windows.

So a new paragraph 9e is needed, which says:

"**9e.** Residential properties with habitable rooms within the 40dB LAeq (8 hour) night time contour, who are not already eligible under 9d, will be eligible for noise insulation and ventilation detailed in Noise Mitigation Plan".

### Noise Quotas

The new Paragraph 9c says:

”9c. “(a) The airport will be subject to an annual noise quota of [numeric] between the hours of 0600 and 0700.”

(b) Any aircraft which has a quota count of 8 or 16 cannot be scheduled to take-off or land at the airport between the hours of 0600 and 0700.”

This omits any mention of quota count between 2300 and 0600, and any quota count between 0700 and 2300, and both of these should have such restrictions, to ensure that these two periods are also covered by Quota Counts. This is important because people are disturbed by more flights and not just the noise levels.

The night period of 2300 to 0700 should also have restrictions on the allowable quota count for aircraft using that period, and good practice means a restriction saying:

“(c) Any aircraft which has a quota count of 4, 8 or 16 cannot be scheduled to take-off or land at the airport between the hours of 2300 and 0600.”

### General Aviation

The section Airport Operation paragraph 19, (1) c) refers to General Aviation movement limit of 38,000 per annum.

However as noted above, movements of any aircraft become more annoying as they increase in numbers, and the 38,000 is a huge number, representing 104 movements per day.

General aviation includes a huge variety of aircraft, such as large aircraft used as personal transport of some wealthy people, helicopters which are extremely noisy which spread noise downwards, and small, slow aircraft with very noisy engines which take a long time to fly past so are particularly annoying.

Hence half that number would be intrusive, and fewer would be much better.

I hope this is helpful.

Best wishes,

Chris Lowe

[www.eastmidlandsairport.com/community/environment/managing-our-environment/](http://www.eastmidlandsairport.com/community/environment/managing-our-environment/)

### East Midlands Airport's Environmental Management System

East Midlands Airport recognises that our operations can impact upon the environment and the communities around us and as such we are committed to managing and addressing these.

The airport operates a well established Environmental Management System (EMS) which is independently audited on a six monthly basis. In 2002, East Midlands Airport's EMS became the first of any UK Airport to achieve certification to the international standard ISO14001. Our system assists us in identifying the airport's environmental impacts, implementing legislative requirements and controlling our impacts in line with our challenging environmental targets.

This section considers a wide range of impacts resulting from the operation of the airport and provides information about what programmes we have in place to reduce and manage our impacts.

### **Managing Our Resources**

An airport by default will naturally use high quantities of power and resources. Here at East Midlands Airport, we aim to manage every facet of the airport's functioning, helping reduce the amount of waste and environmental impact as a direct result.

[Click here to find out more.](#)

### **Landscape and Ecology**

Due to East Midlands Airport comprising an expansive grassland area, we endeavour to create a thriving eco habitat for which varying species can thrive. Visitors to the airport can enjoy a thrilling site from investments such as the six-mile walk Airport Trail, inclusive of a picnic site from which to observe the picturesque surrounds.

[Click here to find out more.](#)

### **One Airport - Zero Carbon**

East Midlands Airport was the first in the UK to commit to achieving carbon neutral ground operations by 2012, made possible through reducing carbon emissions under our direct control, alongside focusing on production of renewable energy sources. We work together with colleagues and business partners alike to ensure a standard of best practice across the board where reduction of carbon emissions are concerned.

[Click here to find out more.](#)

### **Reporting and Resources**

View our range of PDF documents highlighting our reports and procedures, including Community Noise Reports, Operational Performance, Air Quality and Other Reporting.