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Deadline 11

FURTHER COMMENTS ON NOISE MANAGEMENT PLAN (NMP) TR020002-004436-NMP, AS REVISED, AND COMMENTS ON ANSWERS TO EXQ4

NOISE MANAGEMENT PLAN

It would seem that the Applicant still ignores the well-being of local residents, as it has not revised some important parts of the NMP, despite making some changes at Deadline 9 in TR020002/D9/2 4T.

The aspects that I comment on below, have already been raised by myself and others at this Examination, so it suggests that the Applicant is not a responsible body, and thus unsuitable to operate an airport, so the ExA should recommend refusal for the inadequate proposals.

The major omission is any process to reduce noise over time, despite the aviation industry promoting less noisy aircraft which should shrink the noise contour areas over time.

It also omits any process for incorporating latest guidance, and in particular the recommendations from the Independent Commissioner for Civil Aviation Noise (ICCAN).

So I strongly support No Night Flights Response for Deadline 9, NNF20, to Question ExAQ4 G4.3, where they say:

“If the ExA awards a DCO to RSP this will be a DCO for the development of a new airport. It is likely that some of ICCAN’s recommendations will be published before that airport is operational. NNF strongly urges the ExA to insert into the DCO itself a condition that would oblige **any airport operator on the Manston site to take account of and comply with any new standards and best practice guidelines as and when they are recommended by ICCAN.”**

The DCO is a very important document and so it is essential to incorporate NNF's proposed clause, but many local people may not find it easy to access the DCO. The NMP is a working document that will be referred to the Airport Consultative Committee for example, and so would be more easily accessible to those who are concerned about noise.

Hence the NMP also needs to ensure that the noise is reduced over time and also needs to be revised to incorporate latest Guidance as well as best practice.

So I strongly urge the ExA to recommend incorporating additional wording in the NMP itself to ensure these outcomes.

Detailed comments on the NMP as revised at deadline 9

1 The table below, on the NPM page 3, still shows values referenced to the WHO 1999 and 2009 values. It needs to be updated to the WHO 2018 values, as they represent best practice.

As a new airport the NMP must follow best practice, because the noise will be much more noticeable and disturbing than the much smaller changes to noise at existing airports.

Obviously the heading saying these are: “the most recent evidence and best practice” is wrong and needs to be deleted.

“The effect levels for aircraft noise adopted for Manston airport are based on the most recent evidence and best practice and are set out below:

Time of day	LOAEL	SOAEL	UAEL
Day (0700 – 2300)	50 dB LAeq,16hr (free- field) ₁	63 dB LAeq,16hr (free- field) ₃	69 dB ₄
Night (2300 – 0700)	40 dB LAeq,8hr (free- field) ₂	55 dB LAeq,8hr (free- field) ₂	
Night (2300 –	60 dB LASmax (outside) for any nightly	80 dB LASmax (outside) for more than 18 nightly	

Effect levels derived from the following information sources (for more details refer to Chapter 12 of the ES): 1 WHO (1999) Guidelines for Community Noise 2 WHO (2009) Night Noise Guidelines for Europe 3 Aviation Policy Framework requirement (Para 3.39) to “offer financial assistance towards acoustic insulation to residential properties which experience an increase in noise of 3dB or more which leaves them exposed to levels of noise of 63 dB LAeq,16h or more”
 4 A precautionary UAEL set in line with Aviation Policy Framework requirement (Para 3.36) “to offer households exposed to levels of noise of 69 dB LAeq,16h or more, assistance with the costs of moving” 4 Based on the findings of Basner et. al. (2006) Aircraft noise effects on sleep: Application of the results of a large polysomnographic field study.

2 The footnote 6 on page 4, still says that “The night time period quota figure has been arrived at based on a typical mix of aircraft operating within the noise levels that have been assessed in the environmental statement, rather than taking the noisiest possible aircraft.”

This means it is NOT the worst case situation, and also that the number of flights could exceed the number represented by the 'typical mix of aircraft'.

As is well known annoyance and sleep disturbance depends on the number of aircraft as well as actual noise levels, so a cap on numbers is needed, set at the same number as used to calculate the Quota Cap.

3 The Quota Counts shown on page 6, still omit QC 0.125 81.0 to 83.9 dB, which is now enforced at at other airports, so must be included here.

4 Paragraph 1.2, Page 6, therefore needs amending to say:

“Exempt aircraft for the purposes of paragraph 1.1.1 are those aircraft which on the basis of their noise data are classified at less than 81 EPNdB and indicated as exempt in Part 2 of Appendix 1 to this Plan. Paragraph 1.7 does not apply to the taking off or landing of such aircraft.”

The whole Appendix 1 in Part 2 of the NMP also needs amending to show the QC 0.125 aircraft.

5 I welcome the amendment to Paragraph 1.7 forbidding aircraft with QC 4 or more from taking off or landing between 0600 and 0700.

However this means that Paragraph 1.4, which covers the hours 2300 to 0600 can allow an aircraft with any QC value!

So the amendment in 1.7 should therefore leave the 2300 as originally planned to ensure that the night time is not blighted with noisy late arrivals, and the evidence in NNF20 shows the importance of severely restricting late arrivals.

6 Paragraph 1.9. page 7, provides no definition of “Emergency flights” nor does it say who would make decisions on which flights could qualify for the categories in this paragraph. So in theory there could be unlimited flights of this nature if there are not clear restrictions on them.

So this paragraph should provide greater clarity by amending it to:

“1.9 Where the responsible person in charge of the airport considers that a flight is a true 'Emergency or a flight operated by relief organisation for humanitarian reasons' it may operate within normally prohibited hours, up to a maximum of 4 flights per month. The airport shall provide the Airport Consultative Committee with the records of such flights and the reasons for allowing them.”

7 Paragraphs 1.10 and 1.11 still refer to very large numbers of flights, out of all proportion to any realistic likelihood of achievement, particularly in view of climate heating, pollution and noise disturbance.

It would be better to halve the the air transport movements, Para 1.10 to 15,000, and General Aviation to 10,000.

There should also be a clause saying:

“If the Airport wishes to increase the flight numbers greater than the limits in Paragraphs 1.10 or 1.11, then the Airport must apply for Planning Permission to the Local Planning Authority showing that it can do so without unacceptable impacts. ”

8 Paragraph 1.12 merely records the forecasts and ensures that they are no larger than the areas given in this paragraph.

In order to limit the airport's impacts, it should have shrinking areas as less noisy aircraft become a larger proportion of the fleet mix. Having the reduction as a percentage of the existing area, would mean a smaller area reduction in future years.

This would provide a real incentive to operators to use the newer, less noisy aircraft.

This would also reflect the Government's intention of such benefits being shared with the local community.

Hence a new penultimate sentence needs to be included saying:

“After the fifth year of operation, and every five years subsequently, the areas enclosed by these contours will be reduced by 20%”

COMMENTS ON ANSWERS TO EXQ4

Ns.4.1 Noise Contour Area Cap

i. What is the “noise contour area cap”?

ii. Where is this “noise contour area cap” set out, described or drawn?

iii. How would the Applicant know if this “noise contour area cap” were ever to be breached given it plans to install just a few noise monitors, several kilometres away from the airport?

iv. What would happen if this “noise contour area cap” were breached – what would be the consequential penalty?

The Applicant's long response is not very helpful because the results produced would not be very intelligible to local communities.

The Independent Commissioner for Civil Aviation Noise (ICCAN) has said it is difficult for most people to understand noise metrics, so it is very important that any metrics used are clear and provide meaningful results.

Noise contours as proposed are most useful when comparing year on year changes, and also comparing one year against a 'Standard year'.

It is also essential to provide a commentary, such as those provided by the CAA's Environmental Research and Consultancy Department (ERCD) (see: www.gov.uk/government/publications/noise-exposure-contours-around-london-airports)

who compare years, populations affected etc.

The Applicant claims that its traffic profile would be different from other airports, but if the data is to be useful then it needs to cover the peak season, so that should not be pre-judged.

A major problem is the use of average noise levels. As well as these the maximum noise levels are needed because average noise levels can hide very noisy peaks.

More Noise Monitors are needed to show what actually happens on the ground – this is clearly part of the verification and confidence inspiring requirements needed to reassure local people.

Providing some actual results in the noisier parts of the map as well as the calculated results would help this.

It would also need validating by an independent body to provide community reassurance, because the data and the manipulations are likely to be opaque to most people.

Ns.4.3 Noise contours commissioned from the Civil Aviation Authority by No Night Flights (NNF) 14th June 2019 Comment on these contours submitted by NNF at Deadline 8.

The Applicant merely says that: “are not truly comparable with the approach adopted in the ES ”.

As previously argued, the ES should cover the worst case situation because that would give confidence that the reality would be no worse than that.

As the reply notes, “the ES was based on detailed analysis of likely flight path options”.

'Likely' is not the same as what may actually happen, so the NNF data which is based on the CAA's long experience and real life information is more likely to represent the actuality.

The Conclusion, paragraph 4.1.1 of the Commentary provided by Applicant's consultants (Wood) claims that Paragraph 1.12 in the NMP will control actual noise but as I note above it does not do this, as the Airport can simply pay fines if the contour area exceeds the areas in the NMP. It also provides no comfort if planes fly different routes to those assumed by the Applicant and Wood, and so disturb areas that never expected aircraft noise.

A notable feature of previous Manston operations was the way aircraft flew all over the place – with no penalties nor recompense to anyone for this.

Ns.4.7 Noise Contours

Produce a full set of contours for easterly and westerly operations.

The Applicant has dodged the question.

My understanding of your question is for contours if operation were to be 100% Westerly (or Easterly) as that would show the effect of periods when the wind is in one direction.

Hence I think they are being deliberately obstructionist.

Ns.4.10 Quota Count Night Time

The Applicant refers to the revised Paragraph 1.8 of the NMP which reduces the Night Time Period to 0600 to 0700.

Hence their proposed 'reduction' actually represents a huge intensification between 0600- 0700 and is totally unacceptable, especially as they talk of 'likely' passenger planes etc., which may be meaningless in reality.

So 2000 is far too high for one hour of the time when people are trying to sleep.

Ns.4.12 Five10Twelve Ltd Noise Contours Produced by ERCD

The Applicant's final paragraph says :”the fact that both NNF and Five10Twelve approach have not been subject to analysis or scrutiny”, but the ERCD is an extremely experienced body on this subject so would not provide answers to unlikely situations, furthermore it has been open to the Applicant to employ Wood or an aviation consultant to scrutinise the ERCD results.

Hence the ERCD results should be given very strong weight.