

Aircraft Noise Action Group

Website: www.aircraftnoiseaction.com; email: admin@aircraftnoiseaction.com

Newcastle Airport Noise Action Plan 2018 draft: Comments

- 1. In ANAG's view, the NAP 2018 draft is the bare minimum** NIAL could have produced and called it a Noise Action Plan and it is no different in this respect from the previous 2013 version. It has significant flaws and omissions (spelt out below) which mean that, in ANAG's view, it is of minimal use as a tool for managing noise from the Airport's activities.
- 2. NIAL is being secretive around the development and finalising of the NAP.** Heathrow, which faces vastly greater controversy and difficulty around the management of noise, has its Draft NAP for 2019-2023 along with supporting annexes and a consultation summary on line and available to the public (<https://www.heathrowconsultation.com/NAP/>). ANAG does not understand why NIAL has effectively hidden the drafting process from the public eye by restricting its consultation to a limited range of known groups and bodies and by enjoining these not to widely share the issues being debated until a final version is produced. In doing so NIAL has minimised input from the wider public, controlled and limited debate and thus compromised accountability and transparency around the NAP and reduced its value.
- 3. This is a key strategic document.** The NAP has a 5 year lifespan and its implementation will have direct implications for the operation of the Airport and its impact on the area around the Airport for some time to come. It is not a short term proposal with limited impact. The comments below are predicated on these assumptions.

If these assumptions are wrong and the plan is regarded by NIAL as non-strategic and of limited significance, ANAG can see little point in proceeding with it and certainly could not support it.

- 4. The NAP is focused on the airport and operators, not on people (also see 10 below).** Noise is an issue for communities around the Airport and, in particular, for individuals who live in these communities. The NAP places a minimal emphasis on describing, understanding and addressing the personal, subjective experience of noise, its emphasis is on the modelling of noise profiles and the specification of technical aviation and aircraft management issues. This **subjective experience** is the source of complaints to NIAL about noise intrusion and ANAG's view is that this very personal element is given insufficient weight in the NAP in terms of understanding and insight. Without this, the plan can not be properly effective as it will not be sufficiently responsive to the concerns of residents.
- 5. The structure of the plan is poor.** The first 7 sections comprise what is essentially background information. This could have appeared in Appendices and/or at the end of the document as key supporting information (also see 6 below). In addition, these sections comprise almost the entire the document before the key NAP actions and measures are seen in section 8 almost as an afterthought. ANAG views this as a weak substitute for a thought out plan specific to the current context with clear goals, targets, analyses and arguments.
- 6. Key strategic information is missing.** There is no clear statement of **high level strategic and operational objectives and targets** anywhere in the document. This statement should have been placed at or near the start of the document. This is a plan with a 5 year life span and is therefore a strategic document and ANAG would expect these critical elements to be unambiguously specified at the outset in order to set the context for the rest of the document and for understanding its purpose and the meaning of the various elements in it.

The absence of high level objectives is a severe limitation in the setting of a framework (also missing – see 7 below) for the specification and implementation of measures and the defining of measurable outputs and performance indicators.

7. There is no options appraisal and, therefore, no framework for NAP measures and actions.

ANAG would expect, in a strategic document of this importance, to see **options and risk appraisals** running from a do nothing scenario through to a full measures scenario encompassing a range of estimated future levels of possible activity types/mixes and scales. In particular, we would have expected this to be done in some detail in relation to the new Airport Masterplan. ANAG would also expect to see a logical explanation of the rationale behind choices the NAP might make from options for noise management action defined in this way. The absence of such an appraisal and rationale does not give confidence that NIAL has thought through actions and effects, costs and benefits and therefore limits transparency and trust.

8. Performance indicators and timescales are missing or not adequately specified. Managing noise depends significantly on effective noise monitoring and data capture with analytics used to identify trends and anomalies, spikes and out of range events which can set against unambiguous performance indicators designed to enable the measurement of the effectiveness of implementation of the NAP.

There are **no quantified performance indicators** in the NAP and neither are any **timescales** specified for achieving them so there is no indication of the intended direction of travel, the extent of change or any target dates by which change is to be achieved. NIAL, on the basis of the NAP as it stands, could not be held properly accountable for the noise impact of its operations, the plan is therefore effectively no use at all.

9. Noise monitoring infrastructure inadequate: The scale, scope and location of monitoring equipment used to capture aircraft noise data and its placement are critical elements in the assessment and performance management of noise impact. Since the implementation of P_RNAV technology, the configuration and noise profiles of approach and departure flightpaths have changed significantly but the placement and scope of monitoring equipment is linked to a configuration which pre-dates the introduction of satnav technology. The NAP does not address this issue.

10. Routine social surveying missing from the plan (also see 4 above). Noise data from monitoring equipment can provide only a partial picture and does not necessarily align with the effects experienced by residents. **The subjective experience of residents** around the Airport needs to be routinely surveyed in order to understand the full extent and impact of aircraft noise and support decision making. Noise monitoring equipment and the capturing of complaints (see 11 below) are both essentially **passive**, NIAL also needs to be **proactive** in trying to understand subjective noise impact. The NAP should address this by specifying that surveying of households will be carried out by a disinterested third party on an annual basis.

In order to support a fully meaningful NAP, social surveying, as well as asking about the experience of noise, should also look at sleep disturbance, quality of life issues, health issues arising from noise, loss of amenity and the negative impact on property values arising from being under or close to a flightpath. These are all effects arising from noise from the operation of the Airport and the NAP will not be able address these issues fully (or at all) without understanding them.

11. Complaints procedures inadequately specified. The complaints process is inadequately specified in terms of content of responses, issue resolution and turnaround times – it should be **subject to performance indicators** and monitored accordingly. It is also not clear how the complaints process, which is one of the key elements in the monitoring of noise impact, is structured to **transparently feed** into NIAL decision making around respite options and into the general monitoring of the impact of aircraft noise and into policy– the NAP needs to specify this. The same section indicates that “if a complaint can not be resolved through correspondence, the

complainant is invited to the Airport to discuss their concerns with Airport Management.”. There is no indication of what “resolved” means or how such a discussion might lead to a resolution, whatever that might be.

The limitations and management of the complaints process as currently configured are **effectively a barrier** to residents making complaints to the Airport, people believe that nothing can be achieved by complaining because nobody listens and/or nothing changes and/or you get the same response each time and/or it takes a long time to get any response – so they don’t complain. Because of this, the Airport is getting a limited picture of the true extent of the impact of its operations and public resentment of the Airport is increasing. The NAP needs to specify a complete re-design of the complaints process to make it more accessible, open and responsive and to improve timely in depth, systematic reporting of complaints to the wider public. It has not done this.

12. Remedial measures minimally specified. In addressing complaints and in giving residents confidence that noise issues will be addressed in a timely way and managed systemically, the NAP needs to set out short and long term remedial measures in some detail. This has not been done. **Respite options need to be fully spelled out** as does the rationale for their deployment under a range of circumstances to the west and east of the Airport (also see **13** below). Properly defined respite options are a key element in enabling effective responses to complaints.

13. Flight path reconfiguration and the effects of RNAV not addressed adequately. Passing reference to some future reconfiguration of flightpaths is insufficient, the location and management of these is **central to the issues the NAP is intended to address**. The Airport needs to spell out its intentions for reconfiguration (and a timescale) to the east and west of the Airport in some detail in the NAP.

In addition, there is insufficient attention given to addressing the **negative effects of the deployment of P_RNAV** satellite technology which has increased noise levels for significant numbers of residents.

14. Action plan actions list is ineffectual and consists of a number of statements of intent with performance indicators that are not quantified and/or do not have parameters attached which could support the holding of NIAL to account around the implementation of its NAP. Basically, the action list is weak and has little meaning in terms of achieving outcomes in a measurable and transparent way.

15. Consultation, accountability and reporting framework is inadequate. In developing the NAP for 2018, NIAL has consulted with known stakeholders/groups rather than the wider public and the NAP maintains this restricted approach. DEFRA used to say that consultation principles should follow those in CAP725, the airspace change policy document. This has now been replaced by CAP1616, which stipulates in depth consultation with the wider public. There is no mention of CAP1616 in DEFRA’s guide and it is indicative that NIAL is consulting with known stakeholders only, rather than the wider public. In the context of environmental objectives, including noise, the thrust of recent airspace policy changes was to increase trust and confidence in the industry and government by enhancing consultation procedures. NIAL’s somewhat hush-hush approach to the development of the NAP 2018 approach runs counter to this.

The NAP needs to specify how NIAL will be accountable for its management of noise to a wider public as well as to known stakeholders and groups with their inherent limitations in a transparent and accessible way. Currently, the NAP does not do this.

Similarly, in ANAG’s experience, NIAL often hides behind the notion that it is merely doing what the government expects and requires. The NAP fits this profile – NIAL could go a lot further in addressing issues covered by the NAP while meeting government demands but it consistently chooses not to.