

LADACAN review of Draft Noise Action Plan 2014

General

Section 5 of the Executive Summary “Identification of aircraft noise problems” sets out the key issues which affect local people, the 5 most important being:

- Night operations
- Noisier aircraft
- Track-keeping
- Arriving aircraft
- Westerly departures

The Noise Action Plan should therefore contain **Actions** to address and mitigate these key issues.

It is not sufficient, as Section 6 goes on to say, for LLAOL just to be committed to:

- Monitor noise (*monitoring alone has no beneficial effect without action to back it up*)
- Manage the effects of noise (*this is relatively meaningless – we should be reducing it*)
- Listen and communicate (*all very well, but...*)
- Review (*what purpose does it serve unless concrete actions emerge to improve things?*)

Instead, it is essential in a worthwhile NAP to commit to taking actions which will drive down noise and to mitigate its effects. The commitments need to be stronger and more definite than:

“..encourage improvements from airlines and other operators”

“..review our approach with a view to delivering further improvement where necessary.”

It is self-evident, given the 5 serious areas of concern enumerated above, that further improvement is always required, so to say “*where necessary*” is patronising. **Having secured planning permission, now is the time for LLAOL to demonstrate a determined commitment to drive down noise and to do this “wherever possible”.**

Commitments

Section 6 states:

“The .. NAP contains 63 measures which over the next five years seek to ensure that noise is managed, monitored and communicated more effectively”.

“The .. NAP includes 63 measures which over the next 5 years seek to ensure...”

“These measures will build on our established noise management programme...”

“Each measure includes a timescale for implementation...”

The implication is that the 63 measures are measures going forwards, building on what has already been done, not a list of measures many of which have already been implemented. It would be better to focus on what remains to be achieved in the new Plan, and remove the items already actioned.

Importantly section 6 also states *“It is also proposed that key performance indicators and targets, ... are agreed with the NTSC.”* This implies a consultative approach in which the views of the NTSC are taken into account – so we trust this review will lead to changes in the content of the NAP.

Specifics

In the light of the above, our comments on specific measures are as follows:

#3: review of procedures

LADACAN has highlighted that the departure procedure adopted by Wizz in July 2013 has led to increased noise over the monitors, and have proposed a study to assess the relative close-in and further-out noise impacts of this change. In the spirit of the above commitments, this study needs to be performed.

#5: portable noise monitor

LADACAN has received direct representation from a number of residents of South Luton who have asked for the portable noise monitor to be deployed in their gardens, and nothing has happened. This needs to be escalated.

#6: new portable monitor

If this has already been acquired, then the action is no longer relevant – or are you getting another one? Can the noise monitor be deployed if/when Howard retires?

#12: fines of up to £1000

What exactly are the fines? A fine of 20p would be “up to £1000”. Please be specific.

#13: Marginally compliant Chapter 3 aircraft

“Monitoring the complaints” will have no effect – these aircraft should be banned forthwith, or a firm action stated which will lead to their withdrawal by a specified date.

#15: night noise

The public commitment to reduce the night noise NVL to 80dB should be specifically included here.

#16: night landing fees

A landing fee at night which is just 1p higher than the daytime landing fee would satisfy this vague commitment. Specifically how much higher (in percentage terms) are the night-time fees?

#17: fines

See also 12 above: specifically what are the fines and how are they set? Is it a sliding scale?

#19: Night Noise Policy

Are we going to see a draft of this review also? When is it going to be performed?

#21: FLOPSC

It is clear that the work of NTSC and FLOPSC are significantly inter-dependent in noise-related areas, so a more effective inter-committee communication and coordination should be achieved: perhaps a group of NTSC noise-aware representatives could be permitted to attend FLOPSC? When and where are the minutes of FLOPSC published? Should they be available to NTSC?

#22: operational procedures

This is the same as #3 and so the two should be combined. We look forward to open discussion in NTSC of the operational procedures as they impact noise.

#23: noisiest aircraft

We need to see some evidence of an approach which will deliver results. At least specifically target particular types and give some timeframes. The 80dB night NVL, reducing to 79dB, will help.

#25: Chapter 3

This is the same as #13 so the two should be combined.

#26: off-track penalties

These have been already been set out in the Section 106: is NTSC going to be consulted as the action suggests? Are these fixed fines or is there a sliding scale “up to £750 / £1000”?

#29: daytime NVLs

These have been fixed in the Conditions: are you saying that there is room for further downward revision?

#31: new departure code

The only recent change to the departure code has worsened noise levels at the monitors – what action does this point refer to?

#36: review to improve noise environment

What specific actions followed from this review which have improved the noise environment?

#39: lower the night noise NVL

..to 80dB as promised.

#40: attend public meetings

LADACAN would like to request attendance at a public meeting to explain night noise control and the disproportionate proposed doubling of flights between 10pm and midnight and 5am-7am.

#46: EH committee

Who will be party to this and where will the minutes be published?

#48: noise complaint review and surveys

Please advise when this occurred and what the outcome and follow-up action was or will be.

#50: engage effectively with NTSC

This implies that genuine concerns raised by NTSC members are given proposer consideration and taken into account wherever possible, not just brushed aside. There should be a sense of partnership in identifying and tackling noise issues, not a brick wall.

#53: local surgeries

We look forward to further details. Will the invitations be open? Is this the same as #40?

#56: Noise Control Scheme

In the light of all the previous commitments to working effectively with NTSC, we would expect to see a draft NCS and to be invited to comment, and for those comments to have a genuine chance of leading to changes. What is the timeframe for this process?

#57: Forecast movements

Unless we have missed it, the agreed Section 106 does not make provision for the supply of forecast movements data, despite John Steel saying at the planning meeting that this would be essential. So please clarify whether the Section 106 does contain such a measure, or is deficient in which case this provision is in addition to the Section 106 reporting.

#60: Forecast movements

See comments for #57

#61: Noise Control Monitoring Scheme

As per #56, will NTSC be consulted?

We trust that our comments will be fed into the production of a revised and more effective Plan which serves its purpose – to control and drive down aircraft noise around Luton Airport.