

STANSTED AIRPORT CONSULTATIVE COMMITTEE

Response to the DfT's consultation on the Draft Aviation Policy Framework.

Introduction

The response of the Stansted Airport Consultative Committee to the Draft Aviation Policy Framework consultation has been prepared with contributions from the main STACC committee and the Environmental Issues Group (EIG), User Experience Group and the Corporate Affairs Group subcommittees.

Each issue is addressed according to the consultation section headings.

An appendix has been included in this document to deliver STACC's view on noise and the environment in a more detailed and expansive way, outside of direct responses to the consultation questions. It is requested that these views be considered as well.

Chapter 2: The benefits of aviation

Fifth freedoms:

- **Do you support the proposal to extend the UK's fifth freedom policy to Gatwick, Stansted and Luton? Please provide reasons if possible.**

STACC recognises that there are a number of underlying and conflicting issues should the UK's fifth freedom policy be extended. On the one hand, the exercise of these new rights potentially could offer a larger range of destinations from the airport and competition with other airports both in the UK and Europe could result in lower pricing options for the Stansted market. However the granting of any rights has the potential to result in adverse environmental impacts for the local community living around Stansted. Appropriate environmental and operational mitigation action would be a key requirement to address any adverse impacts.

In view of these conflicting issues STACC adopts a neutral position towards this proposal.

- **Are there any other conditions that ought to be applied to any extension of the UK's fifth freedom policy to Gatwick, Stansted and Luton?**

As noted above, the operation of additional flights will increase the potential for adverse environmental impact on the local residential communities around the airport. For example, there would be concern should these flights operate during the night as this would increase the potential for noise disturbance when its impact would be most acute. There might need to be an adjustment to the night noise quota and using a noise quota system for daytime operations where particular aircraft are concerned, for example Code F. Correspondingly there may also be a need to limit the type of aircraft operated at specific times to ensure that only the most quiet and noise

efficient aircraft use the airport. Furthermore, any additional noise impact would need to be proportionate to the number of passengers who would benefit. For example it would be unacceptable for a significant number of local residents to be disturbed by an aircraft that was only picking up or dropping off a limited number of passengers. There could also be surface access implications should there be an increase in passengers. All these factors would need to be considered carefully before any additional rights were granted.

Airports outside the South East:

- **Do you agree that the Government should offer bilateral partners unilateral open access to UK airports outside the South East on a case-by-case basis?**

No comment.

Any other comments:

- **Do you have any other comments on the approach and evidence set out in Chapter 2?**

The aviation industry makes a significant contribution to the economy in facilitating communications, travel and export, and to specific sectors. Aviation benefits tourism, manufacturing and engineering - including advanced manufacturing and aeronautics – which have been identified as key sectors for the local, regional and national economy.

In addition to Local Enterprise Partnerships, airports should be encouraged to engage actively with new Local Transport Bodies to ensure that, where possible, transport investment supports airport growth plans and the integration of investment and services.

Chapter 3: Climate change impacts

- **Do you have any further ideas on how the Government could incentivise the aviation and aerospace sectors to improve the performance of aircraft with the aim of reducing emissions?**

STACC supports the measures identified in Chapter 3 regarding efforts to improve the performance of aircraft with the aim of reducing emissions. The proposed new powers for the Civil Aviation Authority (CAA) should result in improved public information about the environmental effects of civil aviation. As such, this should help raise awareness amongst the industry and air passengers and will establish benchmarks against which progress can be measured.

The Government rightly has the aim of reducing emissions but it is essential that this aim is not at the expense of noise pollution. STACC has in previous submissions highlighted the need for a balanced approach whereby the environmental impact of noise disturbance is prioritised at approach and departure routes close to the airport, whereas the environmental impact of emissions is a legitimate priority at altitude and

en-route. The CAA in its proposed new role must not be limited to emissions but to all environmental impacts.

Any other comments:

- **Do you have any other comments on the approach and evidence set out in Chapter 3?**

STACC considers that the Department for Transport should produce an annual assessment of non CO2 effects together with an indication as to how it proposes that these effects should be addressed.

Chapter 4: Noise and other local environmental impacts

General comment – From a local viewpoint it is clear that the least acceptable effect of aviation continues to be noise disturbance. STACC is fully aware that aircraft noise disturbance is a real source of tension between airports and local communities. A key issue is the need to facilitate greater understanding of noise issues and its local impacts. For example, local residents are now increasingly concerned about the frequency of flights in addition to the actual noise levels. Whilst technology advances have resulted in the introduction of new, quieter and noise efficient aircraft, there has however also been an actual increase in aircraft movements over time. Also the latest aircraft may have claimed reductions in noise levels but these can be larger, heavier aircraft where the actual experience does not match the claimed benefits.

The existing method of measuring noise through the use of average noise contours does not enable the impact of the frequency of flights nor the peak event noise to be assessed. In addition an acceptable method of measuring the impact of aircraft noise intrusion on local communities in rural areas such as those around Stansted, where the ambient noise level (excluding aircraft noise) is very low, needs to be developed and should be relative to the surroundings.

The requirement for airports to produce Noise Action Plans should be a key driver for airports to manage and mitigate the impact of aircraft noise in their area. However it is important that the process for developing the plans should include effective consultation with the local community in order to ensure that the final plan is generally accepted. The plans should be seen as “living” documents with a transparent monitoring and reporting regime as well as a mechanism for regular review.

- **Do you agree that the Government should continue to designate the three largest London airports for noise management purposes? If not, please provide reasons.**

STACC considers that the existing designation requirements should continue. However, the noise designation of airports should not prevent the airport and local authorities from continuing to work together to establish other locally agreed improvements including mitigation measures to improve the noise climate.

- **Do you agree with the Government's overall objective on aviation noise?**

The objective in the 2003 White Paper “to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise” remains relevant. However it is important that any noise objective in the new Policy Framework should seek to prevent a deterioration in the local environment around airports and that the Framework should provide further detailed guidance on noise exposure levels to support the strategic overview given in the Noise Policy Statement for England which currently lacks the detailed guidance needed on which planning decisions can be based.

As regards paragraph 4.22 of the consultation document, the definition ‘*to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise*’ is a less demanding objective than that required by the EU Environmental Noise Directive (‘END’). Under Article 1 of the EU END, Noise Action Plans (‘NAPs’) should have the objective of ‘*preventing and reducing environmental noise where necessary and particularly where exposure levels can induce harmful effects on human health and to preserving environmental noise quality where it is good*’. Stansted’s rural location results in a very low ambient noise environment and there should be added safeguards introduced to protect rural areas from noise exposure.

- **Do you agree that the Government should retain the 57 dB LAeq, 16h contour as the average level of daytime aircraft noise marking the approximate onset of significant community annoyance?**

STACC agrees that it is now appropriate to review the issue of contours.

The 57 dB LAeq, 16h contour – indeed any contour based on the LAeq averaging system – is not a reliable measure of the extent of noise disturbance because it is insensitive to the frequency of noisy events and it understates the impact of aircraft noise intrusion on local communities – especially in rural areas where ambient noise levels are low and consist largely of pleasant, natural sounds.

STACC is aware that the 55 Lden contours (which are produced on a year round basis) are used for the production of the END strategic noise maps and noise action plans. The ANASE study indicated that communities were now experiencing annoyance at lower levels than before. There are also indications across a number of airports that frequency of over flight at a lower figure is increasingly a source of community annoyance. A system based on averages is clearly not appropriate to measure this impact. Given these developments, it seems clear that there is public dissatisfaction with the current system. Accordingly STACC considers that the Government should undertake a review of available noise metrics and should consult on options for future noise measurement and monitoring. Further research should also be undertaken on how aircraft noise impacts on communities living around airport and at what level this impact becomes significant and unacceptable.

It should also be noted that airport related ground noise is also a source of disturbance and annoyance and as such should be recognised in the new Policy

Framework and included in the production of noise contours or any other new noise metric.

- **Do you think that the Government should map noise exposure around the noise designated airports to a lower level than 57 dBA? If so, which level would be appropriate?**

As stated above, research is required to determine what can now be considered to be a universally accepted level of noise exposure. This work could usefully be taken forward by ANMAC. Such work should include assessing the impact in rural areas where the noise is likely to be more annoying, partly because of the lower ambient noise, and partly because of the greater expectation of peace and quiet.

The 57 dB(A) Leq noise metric is totally inadequate and noise contours to 54 dB(A) Leq should be provided when the 16-hour LAeq metric is used. However noise mapping is already undertaken for 24-hour Lden which provides a slightly better method than 16-hour LAeq for assessing noise disturbance since it weights the sensitive evening and night periods.

Both methods suffer from the same fundamental flaw, which is the averaging out of a discrete number of noisy events over time. However until an improved measurement system is introduced, the 24-hour Lden metric should be used as an interim measure with a 55 dB Lden level being the indicative level of onset of significant annoyance. Noise maps using Lden should be produced annually to enable the local community to better monitor how the airport is performing to avoid, prevent or reduce the exposure to noise.

- **Do you agree with the proposed principles to which the Government would have regard when setting a noise envelope at any new national hub airport or any other airport development which is a nationally significant infrastructure project?**

The principles seem appropriate for use in the event of a new national hub airport and other major airport developments. The suggested option of relating the number of people exposed to noise against the number of aircraft movements is an approach worth investigating. However, in more sparsely populated areas, with the introduction of P-RNAV and the ability of aircraft to fly the same flight path, it could be more difficult to use the same formula as that for airports located in dense populated areas e.g. Heathrow. Accordingly any envelope would need to reflect local circumstances.

The first priority in seeking to address the problem of aircraft noise disturbance should be to introduce an improved measurement system for aircraft noise, which the public could have trust in, such as that described in the ANASE report. The sole use of an averaging metric over time such as a LAeq is not representative of what people actually hear when annoyed by aircraft noise.

- **Do you agree that noise should be given particular weight when balanced against other environmental factors affecting communities living near airports?**

Noise (both air and ground) remains the most disturbing environmental impact for local communities. As stated above STACC believes that aircraft noise pollution should be the primary consideration in the airport's locality with emissions treated with seriousness at altitude and en-route. It is also important that an appropriate balance is struck between all other environmental impacts, such as traffic noise and emissions. STACC looks forward to receiving the Government's interpretation of how these priorities can be effected.

- **What factors should the Government consider when deciding how to balance the benefits of respite with other environmental benefits?**

Respite can provide a valuable means of noise mitigation for communities affected by noise. As such, STACC generally supports the concept of respite provided that it neither involves diverting flight paths over areas which are at present not over flown nor increases the number of people affected by noise disturbance.

STACC considers that the principle of noise preferential routes (NPRs) should be maintained as the routes provide an element of certainty for local communities. However there would be value in considering the scope for improvement. The policy of STACC has always been to maximise adherence to the NPR's at Stansted, which whilst they have failings due to inter-action with routes from other airports, have been designed to try to limit the number of local residents affected. The development of P-RNAV provides an opportunity for even greater certainty of flight paths and as such may be a useful tool to improve NPR centreline performance. It is appreciated that other airports may well take advantage of this technology to provide respite on heavily congested routes overflying densely populated areas.

- **Do you agree with the Government's proposals in paragraph 4.68 on noise limits, monitoring and penalties?**

Yes. It is clear that the existing limits and penalties which have been in operation for some considerable time should be reviewed and updated as it is very rare for aircraft operating at Stansted to infringe the noise control limits, especially the height and departure noise limits.

STACC welcomes the initial work that ANMAC has proposed which will review both arrivals and departures noise limits.

As regards penalties, STACC agrees that the existing level should be reviewed. It is important that any new limits, with tougher penalties, should provide an effective means of limiting noise around airports. However STACC recognises that there may be occasions when external operational factors have contributed to a breach. Accordingly it is suggested that a full explanation is associated with any penalty action.

- **In what circumstances would it be appropriate for the Government to direct noise designated airports to establish and maintain a penalty scheme?**

Designated airports should continue to operate a penalty scheme. STACC is aware that legislation exists, which could be used to direct airports to operate a scheme. Airports have introduced schemes on a voluntary basis but it would be advantageous that these have statutory backing. However, if an airport refused to set up a penalty scheme, it would be appropriate for the Government to introduce the necessary Order.

In what circumstances would it be appropriate for the Government to make an order requiring designated airports to maintain and operate noise monitors and produce noise measurement reports?

Again the designated airports (including Stansted) maintain and operate noise monitors on a voluntary basis. The location of noise monitors is determined through the Noise and Track Keeping Working Group which includes representatives of the local communities. Subsequent reports are then discussed by the Group and the scope for any action considered. This system of local engagement currently operates on a satisfactory basis but it would be advantageous that these have statutory backing should it be necessary.

- **How could differential landing fees be better utilised to improve the noise environment around airports, particularly at night?**

STACC considers that airports should review the existing system of landing fees. The introduction of higher landing fees at night on the most noisy type of aircraft could incentivise airlines to operate the quietest and cleanest aircraft at night but this needs to be in conjunction with an effective movements and noise quota scheme. The current night flights regime at Stansted is evidently generous with flights operated comfortably within the limits. As such there is no pressing incentive for airlines to invest in/use quieter aircraft.

- **Do you think airport compensation schemes are reasonable and proportionate?**

Current criticisms of existing schemes are that they could be more generous and apply to a wider area. It has also been suggested that all rooms within a house should be eligible not just bedrooms and grants should be offered for the replacement of double glazing installed many years ago.

Compensation schemes around major airports vary within the UK. Consideration should be given to establishing a standardized system. The scope of future schemes will need to await the outcome of further work by ANMAC on reviewing levels of noise exposure and annoyance.

The key to compensation schemes is that they should a). be pre-emptive and b). evaluated according to (potential) usage or throughput at airports rather than on any particular phase or stage of construction or development. The current system is open to abuse and delays.

- **Do you agree with the approach to the management of noise from general aviation and helicopters, in particular to the use of the section 5 power?**

In the case of helicopter noise, more effort should be made to mitigate the noise impacts. The opportunities for improvement embrace the complaints system, pilot awareness and further research into the human response to and more accurate prediction of helicopter noise. In addition, making an operator aware of problems can often result in changes to operational procedures that help alleviate the public disturbance.

Please see the attached paper that was presented to ANMAC earlier this year.

- **What other measures might be considered that would improve the management of noise from these sources?**

See above

- **Do you have any further ideas on how the Government could incentivise the aviation and aerospace sector to deliver quieter planes?**

STAAC notes that the aerospace industry is seeking to develop quieter and cleaner aircraft with research currently in train to reduce noise footprints and lower emissions of noise from engines and airframes. It is in the industry's interest to do this as such developments can lead to a more efficient operation with better fuel consumption and less air pollution.

Greater transparency relating to the publication of performance data, for example on track-keeping and CDA adherence, may act to incentivise airlines to improve their operating performance and ensure flight procedure best practice.

- **Do you believe that the regime for the regulation of other local environmental impacts at airports is effective?**

All airports including Stansted should be encouraged to take measures to reduce pollution levels even where they do not exceed EU limits.

Chapter 5: Working together

- **Do you think Airport Consultative Committees should play a stronger role and if so, how could this be achieved?**

STACC welcomes the Government's endorsement of the valuable role played by the airport consultative committees (ACCs) and the contribution that they can make towards the development of future aviation policy. It is noted that the Government's existing guidance for ACCs dates from 2002 and as such does not reflect subsequent developments. Accordingly STACC looks forward to an early consultation on revised guidance. It is important that any revised guidance reflects the variations between UK airports and remains non-prescriptive and flexible as what works well for one ACC might not be appropriate for another.

In considering any enhanced role, it should be remembered that ACCs are consultative bodies with no executive powers and are reliant upon the relevant airport operator for resources. A strengthened role would require greater involvement of Committee members in more detailed work than now albeit presented in terms that lay people can understand. Strengthening the role of ACCs will require enhanced engagement with members, local communities and other bodies and the need for more independent research, scrutiny and advice, possibly through the Committees' Secretariats. It may also mean the formation of sub-groups that meet and report to the full ACC. The Government will therefore have to consider how this can be provided and who should fund an enhanced role.

Whilst recognising the commercial imperatives of the company running an airport a strengthened ACC role should also consider how any unresolvable disagreements with an airport over policy or operations should be handled. Is there a case for having an escalation procedure where the issue is externally reviewed with a direction given?

STACC has also considered the present funding arrangements whereby a consultative committee is funded by its matching airport operator and whether this raised issues as to the fact and, equally important, the perception of independence. This was especially so in relation to the Chairman of such committees which position STACC believed should be independent and seen to be independent. Given that the prospect of additional finance from local or national government sources was unlikely, STACC has considered whether there might be other alternative sources of financing. One suggestion was that the CAA might provide the resources for consultative committees. However, it was queried whether the CAA would be seen as independent itself given that the Authority provided aviation policy advice to Government and was the regulator for the industry. It was also noted that current legislation did not provide committees with any executive powers. Furthermore, under the same legislation, airports were required to provide consultative facilities

The draft Policy Framework proposes that ACCs might act as a forum to assess the concerns of individuals living near the airport who may be exposed to significant aircraft noise and other environmental impacts. This role is currently outside the scope of ACCs' remit and current DfT guidelines. Whilst ACCs may review impacts on communities following a significant number of complaints, they do not investigate individual complaints and are not set up to provide a forum to act as an arbiter of last resort. Under the current guidance, the role of ACCs is to:

- monitor and seek investigations into trends and issues affecting communities rather than that of an individual
- generally oversee the processes in place to handle individual complaints to ensure they are effective and that complaints are able to be investigated and dealt with appropriately.

The current structure and resource constraints would make it difficult for ACCs to adopt the role suggested by the draft Policy Framework. STACC invites the Government to review the wording of the draft Policy Framework to ensure that it relates to concerns of communities rather than individuals.

STACC regularly reviews the way it works. In terms of improvements, the Committee proposes to consider how it communicates its work to the wider community. It is key that local communities and individuals should have a clear understanding of the role of an ACC. Whilst there is effective liaison between the Committee and the airport, consideration is now being given as to how the Committee might be involved at an early stage in contributing towards the setting and monitoring of targets. There may also be a role for the Committee in reviewing complaint handling processes.

STACC will work collectively with other ACCs from the major UK airports through UKACCs in formulating a response to the Government on areas where the current guidelines for ACCs need revising.

- **Is there a case for changing the list of airports currently designated to provide consultative facilities?**

Yes. There would be value in reviewing the list to consider whether any changes are necessary.

- **Do you agree that the Civil Aviation Authority should have a role in providing independent oversight of airports' noise management?**

The CAA is a leading world authority on aircraft noise issues and their expertise has been valuable in informing airports (and ACCs). The organisation could be tasked with independent oversight of Stansted Airport's noise management providing its brief was sufficiently flexible to accommodate the individual needs and requirements of specific local issues and the corresponding environmental considerations. It would also need to have adequate resources to enable a proactive contribution.

- **Do you agree with the Government's overall objective on working together?**

STACC considers that it is important that all interested parties affected by the operation of an airport should work together and supports an overall objective to further this aim. However, it notes that the current consultation seems to propose devolving responsibility for airport-related matters, either to ACCs, the CAA or a combination of both. As it is the Government who sets the policy framework and has a role in the noise management of noise designated airports such as Stansted, there is a need to ensure that the DfT maintains appropriate oversight and accountability. As noted above the CAA possesses key expertise to carry out certain functions, but STACC is concerned that the document describes the CAA as "independent" since it is wholly funded by the various elements of the aviation industry and provides policy advice to Government.

STACC notes the proposal to review membership and terms of reference of committees is noted but considers this needs to be undertaken alongside the review of the DfT guidelines for ACCs.

- **Do you agree that, where appropriate, the periods covered by master plans and noise action plans should be aligned?**

STACC considers that the present situation is unsatisfactory whereby the production of master plans appears to be very much at the discretion of the airport operator. One solution might be to require airports to produce the plans on a statutory basis and STACC believes that a mechanism be found that encourages airport operators to produce long term master plans and updates on a regular basis.

STACC
October 2012

APPENDIX

The following information further explains the STACC views on environmental impacts that should be considered in the consultation on aviation policy

Noise Metrics

All recent evidence, both detailed reports (ANASE) and evidence put at airport planning inquiries (Heathrow T5 and Stansted G1), shows that the 57 dB LAeq noise metric does not equate to 'the approximate onset of significant community annoyance'. It would be quite wrong for the new Policy to retain this outdated measure as proposed in paragraph 4.27 and to do so is likely to seriously devalue the Policy Framework in the eyes of the public.

In addition to failing to reflect 'significant community annoyance' the current Government approved method of noise measurement using the LAeq noise averaging system understates the true impact of aircraft noise intrusion on local communities – especially in rural areas such as around Stansted where the ambient noise level (excluding aircraft noise) is very low and consists largely of pleasant, natural noise. The extant method is insensitive to and does not reflect the annoyance caused by the increased number of flights, where each event is distinctly heard close to an airport.

It is not useful for STACC to suggest an alternative measure of 'significant community annoyance' though all available evidence would suggest 54 dB LAeq as a minimum. It may be the term itself is no longer helpful in policy terms. At the very least, and as a first step towards properly tackling aircraft noise disturbance, the Government must introduce an improved measurement system for aircraft noise, such as that described in the ANASE report. Moreover the evidence gathered in the course of the ANASE study clearly showed that the DfT is relying upon an out-of-date system for assessing aircraft noise impacts, based as it is on dose/response surveys in the early 1980's and when the volume of air traffic movements was much less than today. A doubling of like-for-like aircraft movements will increase the LAeq by only 3dB which is not reflected in those surveys. We expect the DfT to take forward the work of ANASE and develop a new framework for the measurement and control of aircraft noise impacts. The new framework should also take full account of the recommendations set down in the WHO *Guidelines for Community Noise*.

As regards metrics to be measured it is important that the day and night LAeq contours are retained with the day contours extended to 54 dB LAeq. LAeq contours are important for comparison over time; are used for noise compensation and form part of (Stansted's) planning conditions. While extending to 51 dB LAeq might better encompass the area generally affected by aircraft noise from an airport it is understood the computer programme is unreliable at this level so such an extension would be unreliable.

However the 55 dB Lden contours are also important being part of the airport NAPs and for comparison across Europe and so should also be provided on a regular basis. Indeed, the Lden contours under the Environmental Noise Directive provide a better assessment of the impact of noise for the sensitive evening and night periods.

In the absence of further assessment measures, including for example more appropriate weighting of the number of flights and background noise levels, STACC prefers the 55 dB Lden method to the 54 dB LAeq method. STACC notes that providing both sets of contours incurs additional cost but would hope that given much of the data is identical and both are produced at present (albeit not annually for Lden) the extra cost can be minimised.

There is a need to update current planning guidance which sets noise thresholds to be used in reaching planning decisions

Noise Envelopes

As the FC notes, noise envelopes serve a number of purposes. At Stansted an envelope of a maximum 57 dB LAeq contour and maximum aircraft movements as planning conditions provides surety that a given (annual) noise level will not be exceeded. This is of value to the public and STACC would not wish to see it lost but it does nothing to reduce noise on a day to day basis or provide incentives to operators to reduce noise. Additionally it would in practice allow the number of flights to substantially increase even if there were just a slight reduction in the average noise produced per aircraft.

STACC welcomes the FC's commitment to the latter two aims but questions whether the proposals in the draft (e.g. paragraph 4.40) would achieve them. An envelope of noise divided by movements (efficiency) or simply a contour area could be set at 'present' levels with a reduction expected year on year while allowing more movements within that (reducing) noise level. However it is difficult to see how it would work in practice, particularly at an airport such as Stansted which is already relatively noise efficient and where if growth does occur (within the existing planning permission) an increase in the noise climate is inevitable. Local communities look forward to the time when aircraft become noticeably less noisy. Such a benefit should not be diluted or even neutralised by an increase in the number of flights in line with the average noise reduction achieved per aircraft.

STACC would welcome further discussion on how airlines can be incentivised to introduce 'the quietest suitable aircraft' at an airport not subject to proposals for major development.

Noise abatement operational procedures

EIG welcomes the FC's intention to retain NPRs but improve them where necessary. This should include ensuring all are to 4,000ft minimum but preferably cleared for fast climb to above 5,000ft. Similarly CDAs must be assured on all approach routes into major airports (a particular issue at Stansted).

STACC is of the view that noise is such an issue in the near vicinity to airports that it should be given particular weight over other environmental factors.

STACC considers that the principle of noise preferential routes (NPRs) should be maintained as the routes provide an element of certainty for local communities. However there would be value in considering the scope for improvement. The policy

of STACC has always been to maximise adherence to the NPR's at Stansted, which whilst they have failings due to inter-action with routes from other airports, have been designed to try to limit the number of local residents affected. The development of P-RNAV provides an opportunity for even greater certainty of flight paths and as such may be a useful tool to improve NPR centreline performance. It is appreciated that other airports may well take advantage of this technology to provide respite on heavily congested routes overflying densely populated areas.

Different noise limits could be set for different types of aircraft on take-off. At Stansted, very few aircraft infringe the DfT noise limits on take-off since the vast majority of aircraft are B737/A319 for which the departure QC is 0.5 so it should be possible to introduce lower limits.

Currently a minimum gradient of 4 degrees is required up to 3,000ft or 4,000ft for jet aircraft. It is considered that with the ability to perform Continuous Climb Departures (CCD) and the improved climb capability of more than 5 degrees of modern aircraft, the current 4 degree gradient of climb angle could be increased.

To encourage avoidance of unnecessary reverse thrust particularly at night, the UK AIP guidance notes could be strengthened to state that *“reverse thrust above idle shall not be used except for safety reasons”*.

Depending upon which of the two types of Noise Abatement Departure Procedure is used at Stansted, there is a small difference in fuel burn and a large change in the location of noise exposure on the ground. Close to the airport, noise reduction should take precedence over any fuel burn economies which are of marginal benefit in terms of fuel savings and emissions over the total duration of a flight.

Night noise

Night flights are a major source of community annoyance at Stansted and this arises from both aircraft movements and ground noise. This should not be surprising in view of the low levels of background noise within this largely rural environment. There is also a knock-on effect in terms of sleep disturbance caused by road traffic related to early morning and late night flights. Roads around Stansted are busy from about 4am until midnight.

Looking forward to the next Night Flying Restrictions regime for Stansted, there should be a re-evaluation of the need for night flights based on clear evidence to establish whether there is a real need and to move them into the day wherever possible. The night quota period should be extended from 6½ hours to 8 hours (subject to effective controls being imposed).

Noise limits, monitoring and penalties

STACC welcomes the FC's commitment to reviewing departure noise levels linked to tougher enforced penalties and monitoring (paragraph 4.68). However the present system is for simple maximum noise limits (day and night) which are applied to all aircraft. This system may work adequately at Heathrow where the majority of aircraft are large and relatively noisy but has little impact at Stansted where the vast majority

are smaller and the most modern available. The noise limits are very rarely exceeded.

A lower maximum level might help to 'dis-incentivise' some of the larger older freight aircraft that use Stansted, though it might just drive them to an alternative airport. However it will not help to ensure that all aircraft at the airport are flown in the most noise efficient way in a manner which would contribute to noise minimisation. The large majority will be below the maximum noise limit however they are flown.

The issue at Stansted is exemplified by the operations of Air Asia X in 2010. Air Asia X started as a new long haul operator at the airport flying a noisy, for Stansted, A340 at various times including night flights. The operations caused great public annoyance but the airport was unable to persuade the operator to change its quite legal aircraft or give up its night time slots. EIG is not convinced the proposals in the FC would provide an airport or the public with any workable controls to address such an issue in the future.

Noise from GA and helicopters

At the ANMAC meeting on 12 March 2012, the London Stansted Noise and Track Keeping Working Group presented a paper for a suggested work stream on Helicopter operations and noise. Following discussion, it was considered that although a topical issue, this was an area that ANMAC should not consider as part of its remit and it was noted that the forthcoming draft Aviation Policy Framework would address the issue of noise from helicopters and general aviation.

This London Stansted Noise and Track Keeping Working Group paper dated 12 March 2012 on Helicopter operations and noise is reproduced as a further Appendix to this STACC consultation response with the permission of BAA Stansted.