

Aircraft Noise Action Group

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Comments on Newcastle International Airport: Masterplan 2035 (consultation draft) consultation process.

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Introduction

This document comprises comments on Newcastle Airport's Masterplan for 2035 including comments previously submitted around the consultation process. It also includes our comments on the Noise Action Plan for the sake of completeness, our comments on the Masterplan relate significantly to the NAP and its relationship with the Masterplan

- 1. ANAG fully understands the significance of Newcastle Airport** in the economy of the region and that it provides an important service to business users, to people taking holidays and breaks and to other users traveling to see family and friends etcetera. We are not opposed to the existence of the Airport and the services it provides.

We also recognise that the Masterplan is a key strategic document supporting the future running of the Airport as a profitable business delivering shareholder value and, again, we are not opposed to this in any way. However, we hold the view that the Masterplan has to work as an integrated whole, not just in those parts that deliver business benefits via services to passengers.

One of the principal negative impacts arising from the operation of airports is that of noise and if NIAL and other Airports do not manage this adequately, there will continue to be proven negative impacts on quality of life and health for communities affected by noise with costs to people and families and to the state in terms of sickness and health care provision.

Our comments on the Masterplan reflect our view that NIAL's management of some elements of its current impacts is not adequate and that, should this continue to be the case, the negative impacts of noise in particular will worsen. In spite of its references to regulations around environmental impact and to the carrying out of Environmental Impact Assessments for major developments, past and current experience of NIAL's management of noise impact gives us no confidence that noise effects of roll out of the Masterplan will be adequately managed by NIAL.

- 2. ANAG's principal interest in the Masterplan** is around the environmental impact proposed developments might have. In particular, our concerns are about but not limited to aircraft noise as it affects communities living around the Airport and especially under departure and arrival flightpaths. We are also concerned that the exhaust emissions from aircraft taking off for communities near the start of the take off process has not been properly addressed (see section 3 below)

We have recently commented on NIAL's **Noise Action Plan (NAP)**. This has been developed from the previous 2013 version and covers the period 2018-2033. We expect that future versions will similarly be developed incrementally from the version current at the time. We are of the view **that the Masterplan and the NAP should be closely coupled** since the latter is intended to manage the noise impact of the former and that this coupling should form a major element of and **be integrated with the Masterplan**. Currently, this is not the case. ANAG's view of the draft

NAP 2018-2023 is that, as it stands, it is **not fit for purpose** (our comments on the NAP are appended to this document for the sake of completeness).

Our view is that, if the NAP is not fit for purpose, then the Masterplan as a whole is **similarly not fit for purpose** either since it does not adequately address key issues of the impacts of noise on communities around the Airport. If future versions of the NAP developed during the timespan of the Masterplan resemble the 2018-2023 version, as seems likely, then the Masterplan as a whole will continue to be unfit for purpose.

- 3. The Masterplan 2035 focuses on airport growth** which we understand to mean an increase in numbers of passengers and, therefore, an increase in the number of flights in and out of the Airport should the forecast growth occur. More flights means more noise more often across a larger part of each 24 hour period.

Also included in the Masterplan is an option (uncosted) for NIAL to extend the runway. If this were to happen as described in the Masterplan, the start of the runway when used for take off and landing in a westerly direction, which represents around 70% of aircraft movements, would be a lot closer to the villages of Brunswick and Hazelrigg resulting in an increase in noise impact and exhaust pollution (a particular problem at take off when engines are at full thrust) for these villages.

An extended runway would allow larger aircraft to take off and land, opening up new destinations for direct flights from the Airport which is an aspiration clearly expressed by the Masterplan (see Sections **3** and **6** of the Masterplan). This represents an additional risk of noise impact to the west and east of the Airport.

Opening up routes to more distant destinations also increases the likelihood of increased night time activity for aircraft landing and taking off given the longer flight times to more distant destinations. This also represents an additional risk of noise impact to the west and east of the Airport.

As it stands, NIAL's NAP is, as indicated above, not fit for purpose in terms of managing current noise and exhaust impacts and we therefore have little confidence that the probable increase in these impacts arising from the forecast growth will be adequately managed. The Masterplan does not properly address this.

- 4. The impact of P-RNAV satellite technology on aircraft noise is not addressed by the Masterplan** and, in particular, by the NAP. This is a critical weakness.

The Civil Aviation Authority draft Airspace Modernisation strategy (CAP 1690) indicates that a key element of the strategy is *to ensure airspace capacity is not a constraint on the growth of commercial aviation*. To address this issue, satnav technology has been implemented by NIAL and other Airports. This technology enables aircraft to consistently fly down the centreline of any given approved flightpath, the theory being that this liberates airspace for more aircraft to use.

In April 2017, this technology was implemented by NIAL. Prior to this, aircraft were dispersed laterally either side of flightpath centre lines, delivering a shared experience of noise across a wide area with **significant respite**. The effect of the satnav implementation has been to **concentrate noise** in terms of levels and frequency with **minimal respite** and this has resulted in a large increase in noise complaints at Airports where satnav and narrow flight paths have been implemented, NIAL being no exception.

For NIAL, although aircraft noise under flightpaths was a nuisance prior to April 2017, it was largely within the limits of tolerance for communities under the flightpaths. As a result of the narrowing of flight paths, this is no longer the case and, because the NAP does not address this

and neither does the Masterplan. It looks to ANAG that things will get a lot worse and that NIAL has no viable actions options in the Masterplan or the NAP for dealing with this.

5. **The Masterplan, in common with the NAP, uses noise contours** to illustrate noise impact. Noise contours are averages in still air and not representative of experience on the ground and the Masterplan, like the NAP, does not address the subjective experience that residents might have of individual aircraft noise events. Residents don't hear averages, they hear each aircraft passing over head as a separate event and once woken up by a noisy aircraft in the early morning (for example), the noise levels of those following are irrelevant. Night flights are similarly an issue and, again, the Masterplan does not address this either.

Similarly, noise monitoring analytics using approved measures smooth out spikes of noise from individual aircraft by averaging noise data across discrete periods in each 24 hour period. In this context, noisy individual flights in the early morning/evening/night, which have a significant impact on residents and communities, are not identified as an issue which skews the Airport's performance to look better than it is in this respect. The Masterplan does not address this and neither does the NAP.

6. **Flights in summer, during the holiday season** are a special issue which neither the NAP nor the Masterplan address. Generally, low cost and charter flights geared to the leisure market leave frequently in the early hours during the holiday season. They are generally fully laden and so need to use more thrust in order to climb effectively. Also, in warmer weather, aircraft climb less well so more power is needed and jet engines are less efficient when the air is warm so, on both these counts, more power is needed. All of which increases noise levels.
7. **Flightpath re-design.** ANAG is aware that NIAL has retained consultants to advise on options for flightpath re-design but we have yet to see what the options might arise from this consultation. The location of approved flightpaths is central to the issue of noise impact alongside the use of satellite navigation technology in narrowing them.

In the past, NIAL has used flight departure paths to the west and east of the Airport which resulted in Aircraft not making an early turn towards the route to their destination. These flight paths used to go over less populated areas than the current flight paths and the turn to the destination route was made a lot later at a greater altitude with reduced noise impact. As currently configured, aircraft now turn early after leaving the runway and, because aircraft lose height when they turn and have to use more power to maintain and gain height as a result, the noise impact for communities is greater.

As currently configured and managed and if the number of aircraft movements increases as suggested by the Masterplan the flightpaths now in use will lead to an intolerable situation becoming a lot worse. The Masterplan does not properly acknowledge this and does not indicate where future flightpaths might be and how they might be managed. The Masterplan gives us little confidence in this respect and makes no serious commitment to flightpath re-design and management as a means of addressing noise issues.

8. **Masterplan Public consultation process.** A version of the following as already been sent to NIAL, it is included here for completeness.
 - a. ANAG's view is that the consultation process supporting the development of the Masterplan is effectively an announcement with a minimal opportunity for the public to comment on it.
 - b. The Masterplan is a highly complex document with many interlinked detailed elements. A significant level of knowledge and expertise would be needed to fully understand and comment on it, it is clearly not a document that can be easily understood and commented on by most members of the general public.

- c. Experience of at least two of the four public meetings which took place indicates that over half the meeting is taken up with an exposition by Airport managers of the business case for expansion, leaving a mere 30 minutes for questions and in depth discussion of any of the Plan's many complex elements.
- d. In practice, most of the questions asked by residents are about the impact on themselves and most of this is about noise with the business case barely touched on. Questions about noise issues are met by Airport staff with routine responses which have been heard many times before, including especially assertions that departure flight patterns did not change in April 2017 implying that residents' experience of increased noise is not real. This unhelpful and potentially insulting and further damages your credibility.
- e. For anybody attending any of the public meeting sessions, each will comprise a very brief one-time opportunity only with no scope for reflection or subsequent follow up. For anybody who might be affected by the Airport's expansion plan who can't make it to any of these or where these events have not come to their notice for a number of valid reasons – and there could be a large majority of people in this category – it represents no opportunity at all.
- f. The Airport has written letters to a range of representative bodies to announce the Masterplan and the consultation around it. There is absolutely no guarantee that any of these will respond at all or, indeed, carry out a consultation with their constituencies in detail (many of them have neither the time or resources) before feeding back to the Airport and the Airport appears to have no procedure in place for assuring itself that this onward communication happens or for supporting or enabling it.
- g. The Airport has also used social media and the local press to announce the Masterplan and the consultation around it. This can not guarantee that residents most likely to be affected by the Airport's current and proposed activities will be aware of any of this. Non-users of the social media used by the Airport will miss out as will social media users who do not 'follow' the Airport which, in the latter case, will mean the vast majority. Similarly, residents who either don't use the local press and media outputs used by the Airport will miss out as will those who just happen not to use them on the day. The upshot of all this is that most residents 'at risk' will almost certainly have no idea that this is going on.
- h. Similarly, evening meetings and the various drop-in sessions have been held at times that effectively make it difficult for residents returning from work or actually at work to attend.
- i. The Airport has set up an online survey to support the consultation. This is a deeply flawed and skewed survey comprising leading questions, with several being hybrid questions which can not be safely said to have an unequivocally clear meaning which means subsequent analysis can not be relied on in any way.
- j. Options for answering include "Yes", "No" and "Neutral". So, you either agree totally, or you disagree totally – both of which are highly unlikely for every answer. Or you are Neutral which is like saying you don't have a view, which is also highly unlikely in every case, but you are forced to use this option if you don't wholly agree or wholly disagree. There is no scope for qualified responses which can be robustly quantified during analysis. Free text can be added in a notes field attached to each question but, because of the subjective use of terminology, different words used to describe the same thing, alongside issues of spelling, free text is not subject to analysis or quantification in the same way as the fixed responses. This also applies to plain email input and reporting on both of these is bound up with the subjectivity of your interpretation.
- k. In the preparation of the Masterplan, ANAG assumes that the Airport used an internal option appraisal process to determine what was to be included in the consultation draft. Conventionally, options should have included at least: a do nothing option: a do minimum

option and an ideal money unlimited option with variations in between based on traffic forecasts (low/medium/high).

- l. However, this critical preparatory element of the planning process was not offered up for public input, meaning that communities now have no understanding of the context and the reasoning behind the scope and detail and that the Airport has thus limited itself in terms of securing buy in.
- m. By its nature as an aspirational statement (but with serious implications if implemented), the Masterplan puts a glossy positive spin on the Airport's contribution to an imagined rosy economic future for the North East which, since it looks 17 years ahead, can only be a guess not a forecast.
- n. In this context, the Plan is effectively a question begging but one answer, which is "Yes". Given the way the Plan is written and the language used, doubt or questioning could be portrayed as an unreasonable opposition to the optimistic forecast of the Airport's role in the creation of jobs and opportunities for the economy of the North East. Arguably, the Airport might have very little role at all, it would only be able to claim a significant influence on indirect job creation if the many other factors in play in the local, national and global economy perform as predicted implicitly in the plan.
- o. The consequences of Brexit, the most significant political event to affect the UK for many decades, are not factored in at all (the word "Brexit" does not appear anywhere in the plan). The UK economy is authoritatively forecast to shrink significantly for a number of years after Brexit with the North East being one of the most vulnerable parts of the country to contraction of the UK economy. By not taking this very real and imminent event into account, the Plan is quite possibly misrepresenting opportunities for the Airport and its growth and is effectively inviting the public to comment on things that stand a very good chance of not happening within the Plan's time frame or, quite possibly, at all .

Appendix 1: NAP comments

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.