



## **Developing a sustainable framework for UK aviation: Scoping document**

### **Response from Belfast City Airport Watch**



**August 2011**

## Executive Summary

We welcome the Department for Transport's (DfT's) scoping document, and its initiative in taking a considered and consultative approach towards developing a much needed sustainable framework for UK aviation. We believe the DfT must take a much more strategic approach to the development and regulation of airports throughout the UK. However, there are specific reasons why such an approach is urgently needed in Northern Ireland.

Belfast is one of the smallest cities in Europe to be served by two airports. In the past 10 years, the number of passengers handled by one of those airports – George Best Belfast City Airport – has more than doubled. But that expansion has been, in part, at the expense of the other airport – Belfast International, which has lost a fifth of its passengers within three years.

Yet, while Belfast International sits in a rural location with plenty of spare capacity and easy accessibility to most of Northern Ireland, including Belfast itself, Belfast City Airport is right by a major urban residential area. **Some 38,000 people live under or close to one of its flight paths in Belfast alone, and the airport's own figures show that more than 11,000 people are affected by aircraft noise at a level deemed by the UK government to cause 'significant community annoyance'. That latter figure has trebled in the three years since 2007, and is far higher than the 1,500 affected by aircraft noise at the same level near Stansted and the 3,600 people who experience aircraft noise at that level near Gatwick.**

## Key recommendations

Our key recommendations are as follows:

- **Belfast International Airport should be considered to be of strategic regional interest** for three key reasons:
  - it is the only Northern Ireland airport which has the capacity to serve long-haul routes
  - it has a relatively small environmental impact in terms of noise, given its location in a lightly populated rural area
  - it has a location accessible to most people in Northern Ireland and one which could be optimised further to/from Belfast by means of a direct rail link
- **If any further expansion of aviation capacity is to take place in Northern Ireland, it should be at Belfast International Airport and most certainly not at Belfast City Airport for the reasons outlined above**
- **The DfT should conduct a mapping/scoping exercise for all UK commercial airports** which measures and publishes the following:
  - the routes offered by each airport
  - the extent of any duplication of services at regional airports within one hour's drive of each other
  - purpose of trip data for each airport
  - noise contours, with maps and details of the affected populations, at the following noise levels: 50< LAeq, 54< LAeq, 57< LAeq, 60< LAeq, 63< LAeq and 72< LAeq – and which also includes measurements which allow for and properly reflect the greater annoyance, disruption and health risk experienced by

residents in the evening, night-time and early morning, and measures which reflect noise pollution caused by particularly noisy individual aircraft events

- details of all schools within the 57< LAeq contours
- **The DfT's Sustainable Aviation Framework should use this data to identify those regional airports which are affecting a large population (e.g. greater than 10,000) at 54<LAeq and above and/or any schools at 57<LAeq or more, and which are duplicating services provided at another airport nearby.** The Framework should clearly state that **no further growth in traffic is permitted at those airports** unless the airport operator in question is able to prove that any planned growth will not result in an increase in noise pollution.
- **The DfT and, in Northern Ireland, the Department for Regional Development (DRD) should use their existing legal powers to require all airports which cause significant noise pollution (i.e. which are affecting a large population at 54<LAeq and above (e.g. greater than 10,000) and/or any schools at 57<LAeq or more) to meet specified targets for reducing those levels of noise over a five year period.** The precise requirements for each airport would depend on the strategic importance of that airport as measured by the indicators (routes, duplication of services, purpose of trip) as outlined previously. **All airports which fail to meet these targets should be subject to significant fines, commensurate with the scale of their revenues.**
- The data outlined above should be collated and published on an annual basis. The DfT and DRD should review this data after five years and set targets for all airports which meet the above criteria and/or which have failed to meet targets which were previously set. **If an airport operator fails to meet these targets on more than one occasion, its licence should be revoked.**
- The UK government and the devolved administrations should require much greater transparency from national and regional airports about their claimed employment figures.

## Introduction

Northern Ireland has three commercial airports handling scheduled flights – Belfast International Airport, George Best Belfast City Airport and City of Derry Airport. Belfast International Airport was designed to serve the needs of the whole of Northern Ireland. It is situated in a lightly populated, rural area just 16 miles and 30 minutes' drive from the centre of Belfast, and is easily accessible from the whole of the greater Belfast area. Belfast International is also easily accessible for all but the far west of Northern Ireland, being 1 hour 20 minutes' drive from both Derry/Londonderry and Omagh, and is much more accessible to those living in the western counties than Belfast City Airport. Belfast International is supplemented, on a small scale, by the City of Derry Airport which serves the north west of Northern Ireland/Ireland.

Since 1983, Belfast City Airport has operated commercial services, **making Belfast one of the smallest cities in Europe to be served by two airports.**<sup>1</sup> For most of that time, Belfast City Airport has focused on a niche, business-centred, domestic market. However, in recent years, it has expanded its operations significantly and is now entering the international market, targeting people in Northern Ireland who want to take a cheap holiday abroad. **In the past 10 years, the number of passengers Belfast City Airport handles has more than doubled – from 1.2 million in 2001 to 2.7 million in 2010.**<sup>2</sup>

This expansion has been, in part, at the expense of **Belfast International Airport** which is now only regularly operating one of its two runways, and **has lost a fifth of its passengers in the**

**last three years.** This development, combined with the lack of a strategic approach by government towards sustained future development of Northern Ireland's air transport network, has left Belfast International much more vulnerable to competition from Dublin Airport which is now under 2 hours' drive from Belfast, thanks to improved road links.

However, **Belfast City Airport is situated right by a major residential area in east Belfast.** As the prevailing winds are westerly and pilots prefer to fly into the prevailing wind, **most flights take off and land over a huge swathe of east and south Belfast.** **The airport is one of just three to be designated by the European Union as a 'city' airport because of its proximity to a large urban area with a dense population** where:

...a significant number of people are objectively affected by aircraft noise and where any incremental increase in aircraft movements represents a particularly high annoyance in the light of the extreme noise situation.<sup>3</sup>

We estimate that **nearly 38,000 people in the Belfast City Council area alone live under or close to the flight paths which traverse Belfast.** Many of them live in areas of social and economic deprivation. In addition, thousands of people in Holywood and Cultra in north Down are also badly affected by noise from flights which take off and land over Belfast Lough, but which fly close to the coast.

The noise problem is now so severe that consultants' reports commissioned by the airport show that **11,422 people now suffer from a level of aircraft noise deemed by the UK government to cause "significant community annoyance" – more than treble the number in 2007, when it stood at 3,522** (measured as 57 LAeq or over, averaged over 16 hours).<sup>4</sup> **By contrast, official figures show that only 1,500 people suffer from noise at the same level close to Stansted airport, and 3,600 experience this level of noise near Gatwick.**<sup>5</sup>

The same consultants' reports show that **23,810** people living near Belfast City Airport experience noise at 54 LAeq or over, averaged over 16 hours - a higher level than that recommended by the World Health Organisation (WHO) – compared to **12,084** in 2007. (In fact, WHO recommends a level **no more than 50 LAeq** but that level is not measured by the Belfast City Airport data).

This perverse situation - where an international airport in a rural area, designed to serve the whole of Northern Ireland, is losing passengers at the expense of a competitor airport in a built-up urban area creating a noise problem for tens of thousands of people - is due to two key factors:

- The failure of the Northern Ireland Executive to establish and implement robust noise controls, despite having the power to do so
- The lack of any strategic framework for the development of the aviation sector in Northern Ireland

Recently, the previous Northern Ireland Environment Minister, Edwin Poots, made a controversial decision to remove one of the key aspects of the weak planning agreement which constitutes the only real protection which residents currently have against noise pollution. At the request of the airport, Mr Poots removed its seats for sale or passenger limit, enabling a higher proportion of larger and noisier aircraft to use Belfast City Airport. His move further strengthened City's commercial position and weakened International's, as well as ensuring that residents will be subjected to even higher levels of noise.

In particular, Belfast City Airport's expansion is impeding the ability of International Airport to develop long haul routes. As the City Airport's proximity to a huge urban residential area makes it most unlikely it will ever be permitted to operate long haul routes, International is the only airport in Northern Ireland which can develop this market. Long haul routes are vital to the economic health of any region; in the UK and Ireland, short-haul European routes tend to be filled with

outgoing holidaymakers, creating a net loss to a regional economy. Long haul routes are much more likely to bring in American and other long-distance tourist and business visitors who can add value to the local economy.

International Airport's major competitor for long haul traffic is the far larger Dublin Airport. To develop a sustainable, quality portfolio of long haul routes, a regional airport needs a critical mass of passengers, and a strong portfolio of short haul routes which will feed into and help sustain the long haul routes. Dublin has both these characteristics.

However, International's passenger base and short haul offering are both being eroded by competition from Belfast City Airport, weakening its potential for building up its long haul portfolio and competing successfully with Dublin for the direct economic benefit of the region. Currently, International has only one scheduled long haul route (to New York). By contrast, Dublin operates 12 routes to North American destinations alone, many of which gain substantial custom from the Northern Ireland outbound market, as well as from visiting traffic en route to Northern Ireland.

The problem is particularly pressing for Northern Ireland where the only long-term winners of any further weakening of International's position will be Dublin Airport, and the Republic of Ireland's tourist and business economy; there is much less incentive for a tourist who arrives in Dublin to tour Northern Ireland than for one arriving at Belfast International.

We therefore believe that, rather than continuing to encourage City Airport's ad hoc expansion and International's resultant contraction, it would be far more sensible for the UK government to give strategic priority to the development of Belfast International airport as the primary gateway airport for Northern Ireland.

## **Overall comments on the Scoping Document**

We welcome the Department for Transport's (DfT's) commitment to make promoting sustainable aviation one of its structural reform priorities, with a specific objective of adopting a sustainable framework for aviation in the UK by 2013. We further welcome the recognition within the Scoping Document of the noise problem caused by many airports.

However, we are disappointed that the document is largely descriptive and does not contain data on aircraft noise levels nor route/purpose of trip information pertaining to different airports. We are further disappointed that the document does not consider best practice from other countries in considering the promotion of sustainable aviation and, most especially, in considering how best to tackle the problem of aircraft noise. We are unable to offer any best practice examples of our own, but we do believe that research should be carried out to identify them in order to inform the development of the strategic framework.

## **Comments on individual sections of the Scoping Document**

### **The aviation sector**

If aviation is to minimise its environmental impact, it is vital that there is not unnecessary and unproductive duplication of services which involves one or more terminals relatively close to each other which have a significant negative environmental impact. The DfT should take a truly strategic view and determine where such duplication exists. The sustainable framework for aviation should identify airports which have significant negative environmental impacts and which simply duplicate, wholly or in part, services available at other nearby airports. The Department

should determine that no further expansion should take place at these airports. Belfast City Airport clearly falls into this category.

In determining the strategic value of any airport, its capacity to attract inbound tourists and business visitors must be paramount. Routes to popular holiday destinations, such as Ibiza and Majorca, obviously simply suck tourist revenue out of the UK – relatively few residents of destinations such as Ibiza or Majorca are likely to wish to visit Northern Ireland or Great Britain.

We are concerned that, in Northern Ireland, there is no independent data on the proportion of flights which are made for the purposes of inbound and outbound travel, the purposes and length of those trips, or the proportion of people who fly at least once a year, and their demographic characteristics. **We believe it is vital that either the DfT or the Northern Ireland Department for Regional Development (DRD) should commence collating this data independently of the airports, and publish it on an annual basis.** The DfT should do likewise for all national and regional airports in the UK.

**We also believe that the UK government and the devolved administrations should require much greater transparency from national and regional airports about their claimed employment figures.** For example, Belfast City Airport claims it is responsible for 1,500 jobs.<sup>6</sup> However, this figure is based, in part, on speculation. Moreover, the number of local people which it directly employs is tiny.

The airport's own jobs figures, distributed earlier this year to its Airport Forum consultative body, reveal that, **of the 90 people it directly employs:**

- **Just 16 come from east Belfast, its most immediate neighbouring area**
- A further 6 live in south Belfast while 10 are from north Down, the two other areas closest to the airport<sup>7</sup>

**When the airport was asked how it derived the rest of its claimed 1,500 jobs figure, it provided figures revealing that its total includes an unproven assumption that 570 jobs are created or induced indirectly by the airport's activities.** In fact, the airport is only able to attribute 880 jobs (including its own 90 employees) to employment which is based either within the airport or within a 20-minute drive of it, and which is 'wholly or largely' related to the airport's operations. The airport keeps no record of where the individuals holding those jobs live, other than those it employs directly.<sup>8</sup>

### **5.7 Should some aspects of UK aviation be considered to be of strategic national interest (e.g. certain airports, air traffic control)? If so, based on what criteria?**

With regard to Northern Ireland, we certainly believe that Belfast International Airport should be considered to be of strategic regional interest for three key reasons:

- it is the only Northern Ireland airport which has the capacity to serve long-haul routes
- it has a relatively small environmental impact in terms of noise, given its location in a lightly populated rural area
- it has a location accessible to most people in Northern Ireland and one which could be optimised further to/from Belfast by means of a direct rail link

If any further expansion of aviation capacity is to take place in Northern Ireland, it should be at Belfast International Airport and most certainly not at Belfast City Airport for the reasons outlined in our introduction.

## International connectivity and hub airports

### 5.11 Are direct connections from the UK to some international destinations more important than others? If so, which and why?

As noted above, we believe that the most important international direct connections are on those routes which are likely to generate inbound business-related and tourism traffic, and which are the least likely to generate outward-bound tourism trips, particularly weekend breaks.

In order to inform the sustainable aviation strategic framework, we believe it is vital that the DfT collates and publishes trip data, as noted previously, which will help it to determine which routes should be prioritised. However, in the absence of such data, it is fairly easy to draw up a list based on simple common sense.

We suggest that the valuable routes from both national and regional airports are likely to include the following:

- nearly all long-haul routes, with the exception of destinations which are purely tourism-related and which would not generate equivalent reciprocal traffic
- most capital cities and cities with particular significance for business

Most US routes should be a priority because the US is the UK's most valuable inbound visitor market.<sup>9</sup> In research commissioned by VisitBritain, China, India and the Gulf States have also been identified as emerging markets from which significant numbers of inbound tourists might come.<sup>10</sup> Moreover, given the current economic significance of the Gulf States, and the increasing economic importance of China and India, routes to these countries are obviously of value in terms of facilitating business travel. Visitors from Russia and China have also been identified as relatively high spenders.<sup>11</sup>

The economic value of business travel extends beyond business deals; the business sector generates 28% of all overseas visitors and 29% of inbound tourism revenue in the UK.<sup>12</sup> Indeed, while business visitors have shorter stays, they spend more than twice as much per day as other travellers.

The least valuable routes which should be seen as having much lower priority are as follows:

- routes to those destinations (largely seaside and skiing resorts) which attract large numbers of holidaymakers from the UK/Northern Ireland, and which offer little reciprocal traffic for the UK
- routes to those destinations which are generating largely outbound leisure traffic for weekend breaks

There should also be a middle tier consisting of routes which facilitate the following:

- people in relatively isolated parts of the UK e.g. Northern Ireland and the far north of Scotland who wish to travel to other parts of the UK (and Ireland) to see friends and family
- migrant workers who wish to visit friends and family back home

It should also be borne in mind that most of the UK's tourism revenue (78%) comes from domestic UK visitors, and that every effort should be made to encourage UK residents to take their holidays close to home for both economic and environmental reasons.<sup>13</sup>

We further believe that long haul routes, which use larger noisier planes, should not be permitted to operate from regional airports close to built-up urban areas where their operation impacts negatively on a significant number of people. Preference should be given to locating such routes at airports in lightly populated rural areas with good surface transport links and the absolute minimum impact in terms of the size of population affected by aircraft noise.

Other international routes should not generally be located at regional airports which are close to large built-up areas and which cause significant noise pollution for a large number of people; in general, planes flying international routes require larger amounts of fuel and, in order to make them commercially viable, a higher proportion of filled seats than aircraft flying domestic UK/Ireland routes. They are thus likely to be heavier and noisier than aircraft on domestic routes.

In order to minimise aviation-related carbon emissions, the UK government should also be encouraging businesses to maximise the use of video-conferencing as a substitute for international business air travel. However, we accept that face-to-face meetings are sometimes essential and that business-related aviation travel is of strategic importance to the UK economy.

## **Making better use of existing capacity**

### **5.22 Can we extract more capacity out of the UK's existing airport infrastructure? Can we do this in a way which is environmentally acceptable?**

Belfast City Airport Watch does not take a position on the desirability or otherwise of increasing the capacity of the UK's airports, particularly those in Northern Ireland. However, in the context of Northern Ireland, there is clearly considerable underused capacity at Belfast International Airport. As noted above, only one of the airport's two runways is currently used on a regular basis at present.

As we have noted previously, it seems quite ludicrous that the possibility exists of a runway extension at Belfast City Airport (a public inquiry is to be held into the airport's application for an extension), with its concomitant detrimental negative effects on tens of thousands of people, when there is plenty of spare capacity at Belfast International Airport, which is located in a lightly populated rural area, just 30 minutes' drive from the centre of Belfast, and which causes relatively little disturbance for local residents.

## **Local impacts**

### **5.40 What do you consider to be the most significant impacts – positive and negative – of aviation for local communities? Can more be done to enhance and/or mitigate these impacts? If so, by what and by whom?**

#### **The most significant impacts of aviation for local communities**

As already noted above, while there is an assumption that regional airports bring significant benefits in terms of both tourism and jobs to an area, there is a need for much more data to test this assertion with respect to each regional and national airport. We would urge the Department for Transport to ensure that trip data is collated independently and published on a regular basis, and that all airports are required to publish comprehensive and transparent jobs data. These two datasets should be used to help inform the sustainable aviation strategy framework.

Undoubtedly, the most significant negative impact of aviation for local communities is noise and the problems that this causes in terms of its detrimental effect on public health, children's educational attainment and quality of life. The impacts include:

- **lack of sleep –**
  - in a survey carried out by Belfast City Airport Watch in 2009, **more than three-quarters (78%) said that aircraft noise affected their sleep, with almost 1 in 5 (19%) stating that they weren't getting enough sleep**<sup>14</sup>
  - **of those respondents with children, nearly half (46%) said their children weren't getting enough sleep because of aircraft noise.**
- **adverse effect on blood pressure –** in 2003-5, a major EU-funded international study investigated the impact of aircraft noise on blood pressure. The Hypertension and Exposure to Noise near Airports (HYENA) study examined the impact of aircraft noise on 5,000 individuals, aged 45-70 years, living close to six major European airports. **The study found that night-time aircraft noise, including that occurring in the late evening or early morning, caused a significant increase in blood pressure among participants.**<sup>15</sup>
- **heart problems and abnormally high blood pressure –** in 2007, a German study found night-time aircraft noise increased the prevalence of prescriptions for antihypertensive and cardiovascular drugs, irrespective of social class<sup>16</sup>
- **negative impact on educational attainment –**
  - in a survey of schools, under or close to the Belfast City Airport flight path over the city, undertaken by Belfast City Airport Watch in 2008:
    - **12 schools said pupils' concentration was adversely affected by aircraft noise**
    - **9 schools said aircraft noise disrupted teaching and/or classes**
    - 11 said aircraft noise made outdoor activities in school grounds less pleasant
    - 8 said aircraft noise made their school a less pleasant place to work in<sup>17</sup>
  - a major international study, carried out in 2002, found that **exposure to aircraft noise is related to impaired performance in reading comprehension and recognition memory in schoolchildren.** The RANCH Project – which involved an international team of researchers from the UK, Sweden, the Netherlands and Spain - found that exposure to aircraft noise was correlated negatively with children's reading ability, even when other factors were taken into account.<sup>18</sup>
  - a follow-up study to the above research, carried out in 2008, obtained preliminary findings which indicated that **children who attended primary schools exposed to aircraft noise were more likely to have poorer than average reading comprehension at age 15-16 years, and that children in secondary schools exposed to aircraft noise were more likely to have poorer reading comprehension than average**<sup>19</sup>
- **stress and negative impact on quality of life -** the BCAW residents' survey found that:
  - **three-quarters of respondents (75%) said they often had to stop talking when a plane flew over because they couldn't be heard**
  - 71% said aircraft noise made their gardens less pleasant to be in

- more than two-thirds (68%) said they often couldn't hear the TV and/or radio when a plane flew over
- 66% said aircraft noise made their homes less pleasant places to be
- nearly half (49%) said aircraft noise made their lives more stressful
- **annoyance** – annoyance also causes stress. A major study, commissioned by the Department for Transport and published in 2007, indicated that at least 30% of an affected population is likely to be 'very annoyed' if it is exposed to aircraft noise levels at 50 LAeq and above, averaged over 16 hours.<sup>20</sup> As noted previously, the World Health Organisation recommends that communities should not be exposed to a level greater than 50 LAeq.

A further potentially serious negative impact for local communities relates to pollution from aircraft. However, to date, the Department for Transport has not, as far as we are aware, made any attempt to quantify this impact or, indeed, the levels of different pollutants which are being emitted by aircraft as they pass over local communities. We would urge the Department to commission research to determine the types and levels of emissions from different types of aircraft as they take off and land over local communities. This should include research into the impact of the dumping of fuel by aircraft, and the frequency with which this occurs.

#### **What more can be done to mitigate those impacts?**

With the exception of the major UK airports (Heathrow, Gatwick and Stansted), current UK government policy is to devolve responsibility for aircraft noise management to the airport operators themselves, although, in England, the Secretary of State for Transport has powers, under Sections 78 and 79 of the Civil Aviation Act 1982 to intervene and impose direct control over an airport's development and operations with regard to noise management. A similar power lies with the Minister for Regional Development in Northern Ireland under The Airports (Northern Ireland) Order, sections 21 and 22.<sup>21</sup> However, as far as we are aware, the latter have never been utilised and we are unaware of any instances in which the former have been utilised.

Some airports, including Belfast City, are also subject to a planning agreement between the airport and the local authority which, in the case of Belfast City, is the Northern Ireland Department of the Environment. As noted previously, the current Planning Agreement 2008 for Belfast City Airport is weak, neither implemented nor enforced in full, and was the subject of an attempt by the previous Environment Minister to dismantle part of it (currently the subject of a judicial review for which leave has been granted).

This laissez faire approach has clearly not worked. What is required is a more interventionist approach on the part of the UK government and the devolved administrations to minimise noise pollution from airports, and to ensure greater consistency in noise management throughout the UK. This must be combined with a more strategic approach on the part of the government to help ensure that residents are not – as with Belfast City Airport – suffering needless noise pollution because an airport in a built-up urban area is being permitted to expand by duplicating services available at an airport in a lightly populated rural location just 30 minutes' drive away.

We would urge the Department for Transport to conduct a mapping/scoping exercise for all UK commercial airports which measures and publishes the following:

- the routes offered by each airport
- the extent of any duplication of services at regional airports within one hour's drive of each other

- purpose of trip data for each airport as outlined previously
- noise contours, with maps and details of the affected populations, at the following noise levels: 50< LAeq, 54< LAeq, 57< LAeq, 60< LAeq, 63< LAeq and 72< LAeq – and which also includes measurements which allow for and properly reflect the greater annoyance, disruption and health risk experienced by residents in the evening, night-time and early morning, and measures which reflect noise pollution caused by particularly noisy individual aircraft events
- details of all schools within the 57< LAeq contours

The DfT's Sustainable Aviation Framework should use this data to identify those regional airports which are affecting a large population (e.g. greater than 10,000) at 54<LAeq and above and/or any schools at 57<LAeq or more, and which are duplicating services provided at another airport nearby. The Framework should clearly state that no further growth in traffic is permitted at those airports unless the airport operator in question is able to prove that any planned growth will not result in an increase in noise pollution.

The DfT and, in Northern Ireland, the DRD should use their existing legal powers to require all airports which cause significant noise pollution (i.e. which are affecting a large population at 54<LAeq and above (e.g. greater than 10,000) and/or any schools at 57<LAeq or more) to meet specified targets for reducing those levels of noise over a five year period. The precise requirements for each airport would depend on the strategic importance of that airport as measured by the indicators (routes, duplication of services, purpose of trip) as outlined previously. All airports which fail to meet these targets should be subject to significant fines, commensurate with the scale of their revenues.

The data outlined above should be collated and published on an annual basis. The DfT and DRD should review this data after five years and set targets for all airports which meet the above criteria and/or which have failed to meet targets which were previously set. If an airport operator fails to meet these targets on more than one occasion, its licence should be revoked.

**5.41 Do you think that the current local arrangements for local engagement on aviation issues e.g. through airport consultative committees and the development of airport master plans, are effective? Could more be done to improve community engagement on issues such as noise and air quality? Is so, what and by whom?**

Belfast City Airport has a Consultative Forum on which sit a number of airlines and very few community groups. It is not fully representative of the local communities affected by aircraft noise. The airport does, however, provide information on request to groups which sit on the Forum.

The Forum has not prevented the aforementioned trebling in the number of residents affected by aircraft noise at 57< LAeq over the past three years. It is not an effective body in mitigating aircraft noise.

Commercial airports are, by their very nature, commercial entities which seek to maximise profit. The only effective means of mitigating aircraft noise is to subject airports to effective noise regulation, combined with an aviation strategy which takes into account both noise impact and unnecessary duplication of services.

Airports can – and do - change owners at any time and undertakings given by one operator may not be carried through by a new owner. Therefore, while we would welcome any efforts by airports to engage in genuine dialogue with communities, we do not believe that such consultative efforts are likely to result in effective mitigation of aircraft noise. Community engagement should be a welcome addition to but not a substitute for effective government regulation.

Paras. 4.6 and 4.11 of the Scoping Document also refer to the current noise action planning process, required by the EU Environmental Noise Directive 2002. This has proved to be a meaningless exercise, at least with regard to Belfast City Airport. The Airport's five-year 'Noise Action Plan', published in 2009, was a purely descriptive document, containing no noise-related objectives. It stated that the airport estimated there would be no reduction in the numbers of people affected, through its operations, by disturbed sleep, annoyance etc. due to aircraft noise.<sup>22</sup> Indeed, as we noted earlier, there has, in fact, been a significant increase. If airports are not required, through the noise action planning process, to set objectives and take measures which will actually reduce any significant noise pollution, it is, in our view, a pointless exercise. However, we believe it has the potential to contribute to the effective mitigation of noise pollution if airports are required to set objectives for noise reduction.

**5.43 What are your views on the idea of setting a 'noise envelope' within which aviation growth would be possible, as technology and operations reduce noise impacts per plane? What do you consider to be the advantages and disadvantages of such an approach?**

The Scoping Document does not elaborate on what the Department for Transport means by the term 'noise envelope'. We are not in favour of permitting further growth in noise pollution at any airport where significant numbers of local residents are affected, including Belfast City Airport. Neither are we in favour of the use of technological advances to permit an increase in traffic levels within a given 'noise envelope' at such airports. Rather, any such advances should be used as a means of reducing noise levels at these airports. However, without further elaboration, it is difficult to comment on the proposal.

**5.44 Is it better to minimise the total number of people affected by aircraft noise (e.g. through noise preferential routes) or to share the burden more evenly (e.g. through wider flight path dispersion) so that a greater number of people are affected by noise less frequently?**

It is much preferable to share the burden more evenly, through measures such as wider flight dispersion, so that a greater number of people are affected by noise less frequently. We believe that the DfT and the DRD should assess at which airports this move would be feasible, and then require airports to put such measures in place. However, it should be noted that, with regard to Belfast City Airport, there is no way that the flight path can avoid large number of residents.

**5.46 What are the economic benefits of night flights? How should the economic benefits be assessed against social and environmental costs?**

In drawing up any criteria to measure the benefits and disbenefits of night flights, we believe that full account must be taken of the health and educational research cited above in terms of (i) costs to the health service (ii) costs to both the labour market and individuals in terms of lower educational attainment.

**5.47 How can the night flying regime be improved to deliver better outcomes for residents living close to airports and other stakeholders, including businesses that use night flights?**

We can only comment with respect to Belfast City Airport. There is absolutely no doubt that two measures would make a significant difference to the health and quality of life of residents with respect to night flying:

- the enforcement by the Northern Ireland Department of the Environment of the clause within the airport's Planning Agreement 2008 which stipulates that late flights after 9.30pm should only take place in 'exceptional circumstances' (Last year there were 503 such flights)
- the introduction of a ban on flights before 7am on weekdays, 8am on Saturdays and 9am on Sundays

These measures would allow most residents to have uninterrupted sleep during normal sleeping hours (11pm to 7am), and would allow residents a little respite from noise during the early mornings at weekends. They would also ensure that children could sleep from 9.30pm and that others who need to get to sleep prior to 11pm are able to do so. It should be noted, however, that many shift workers live within some of the worst affected areas and often have to sleep during the day. Effective daytime noise controls are also important, therefore.

**5.48 Should extended periods of respite from night noise be considered, even if this resulted in increased frequency of flights before or after these respite periods?**

This would seem only to be an option at airports which have more than one runway. We therefore do not feel we can comment on this.

**Any other comments**

**5.49** As noted above, we believe that the strategy must address the issue of unnecessary duplication of services at airports close to each other, where this is resulting in significant noise pollution.

**August 2011**

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*Belfast City Airport Watch is an umbrella group of 20 residents' associations and community groups, and one trade union branch, opposed to further expansion at George Best Belfast City Airport. It also has a further 550 individual associate members.*

*Website: [www.belfastcityairportwatch.co.uk](http://www.belfastcityairportwatch.co.uk) E-mail: [info@belfastcityairportwatch.co.uk](mailto:info@belfastcityairportwatch.co.uk)*

**List of organisational affiliate members:**

East Belfast groups highlighted in red  
 South Belfast groups highlighted in blue  
 North Down groups highlighted in green

1. The Bridge Community Association
2. Carew II Family and Training Centre
3. Connswater Community Centre/Connswater Community Group
4. Cultra Residents' Association
5. Dee Street Community Centre/The Klub
6. Dee Street Computer Group
7. Dee Street Mums and Tots Group
8. East Belfast Healthy Living Project

9. East Belfast Toddler Group
10. GMB Trade Union Branch 252
11. Hampton Park Residents' Association
12. Holywood Airport Action Group
13. Lagan Valley Group Residents' Association
14. Lower Woodstock Community Association
15. Marlborough Park Residents' Association
16. Newtownards Road Women's Group Ltd.
17. Old Stranmillis Residents' Association
18. Park Road and District Residents' Association
19. Ravenlink Residents' Group
20. Ulidia Residents' Group
21. Wise Men of the East Network (network of nine affiliated east Belfast mens' groups)

<sup>1</sup> George Best Belfast City Airport analysis, August 2010, [anna.aero](http://www.anna.aero) – airline network news and analysis website. See: <http://www.anna.aero/2010/08/18/belfast-city-is-one-of-the-best-airports-in-the-uk/>

<sup>2</sup> Figures from CAA.

<sup>3</sup> Directive 2002/30 of the European Parliament and of the Council of 26 March 2002 on the establishment of rules and procedures with regard to the introduction of noise-related operating restrictions at Community airports, Article 2 (b).

<sup>4</sup> These figures are taken from annual noise contour reports commissioned by Belfast City Airport. The government's guidance on aircraft noise levels is available at: <http://www.caa.co.uk/default.aspx?catid=68&pagetype=70&gid=69&faqid=27>

<sup>5</sup> The figures for Stansted and Gatwick are available in the following Department for Transport reports, published in January 2011 and covering 2009 (see 3.1 in each report).

- Stansted: <http://www.dft.gov.uk/pgr/aviation/environmentalissues/nec/secnoise09/noisestansted09.pdf>
- Gatwick: <http://www.dft.gov.uk/pgr/aviation/environmentalissues/nec/secnoise09/noisegatwick09.pdf>

<sup>6</sup> The airport has claimed that it is responsible for 1,500 jobs on a number of occasions, most recently in its own Citylife magazine – see: <http://www.belfastcitylife.com/news.htm#news3>

<sup>7</sup> Information provided by Belfast City Airport to a residents' association earlier this year (2011) at the request of a residents' association, circulated to all members of the Belfast City Airport Forum.

<sup>8</sup> Further information from Belfast City Airport as above.

<sup>9</sup> VisitBritain press release, 24<sup>th</sup> May 2011: <http://media.visitbritain.com/News-Releases/VISITBRITAIN-REVEAL-NEW-USA-FIGURES-AS-PRESIDENT-OBAMA-ARRIVES-IN-BRITAIN-4253.aspx>

<sup>10</sup> Deloitte *The economic case for the Visitor Economy* September 2008, commissioned by VisitBritain, p. 59.

<sup>11</sup> VisitBritain *Foresight* Issue 58, August 2008.

<sup>12</sup> Business Tourism Partnership *Business Tourism Leads the Way* July 2005.

<sup>13</sup> *Op cit.*, Table 4.3b.

<sup>14</sup> The survey was carried out by BCAW between March and June 2009. 412 respondents were questioned in a door-to-door survey. Each respondent was from a different household. Of the 412 respondents, 281 lived in east Belfast, 99 respondents were from south Belfast, while 32 were from Holywood. All respondents lived in areas which are either under or close to flight paths in and out of George Best Belfast City Airport.

<sup>15</sup> EC News Alert Issue 103. Available at: <http://ec.europa.eu/environment/integration/research/newsalert/pdf/103na1.pdf>. See also Haralabidis, Alexandros S. *et al.* (2008) 'Acute effect of night-time exposure to aircraft noise on blood pressure in populations living close to airports' in *European Heart Journal*. Available online at: <http://eurheartj.oxfordjournals.org/cgi/content/full/ehn013v1>

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<sup>16</sup> Greiser, E., Geiser, C. and Janhsen, K. 'Night-time aircraft noise increases prevalence of prescriptions of antihypertensive and cardiovascular drugs irrespective of social class—the Cologne-Bonn Airport study' in *Journal of Public Health*, Vol. 15, pp. 327 – 337.

<sup>17</sup> 35 nursery, primary, post-primary and special schools responded to the survey. All are situated under or close to City Airport flight paths. The survey was carried out in June 2008. 45 schools were sent postal survey forms. Non-respondents were followed up by telephone.

<sup>18</sup> Further details of the RANCH project can be found at:

[http://www.wolfson.qmul.ac.uk/RANCH\\_Project/Ranch%20Project/Background%20Aims%20and%20Objectives.htm](http://www.wolfson.qmul.ac.uk/RANCH_Project/Ranch%20Project/Background%20Aims%20and%20Objectives.htm) and in a published journal article at: <http://aje.oxfordjournals.org/cgi/reprint/163/1/27>

<sup>19</sup> Clark, Charlotte et al (2009). RANCH follow-up study: the long-term effects of aircraft noise exposure on children's cognition: Full Research Report ESRC End of Award Report, RES-062-23-1165. Swindon: ESRC

<sup>20</sup> MVA Consultancy (2007) *Attitudes to Noise from Aviation Sources in England*, Fig. 7.2 published as Erratum in Nov 2007.

<sup>21</sup> The text of the Order is available at: <http://www.legislation.gov.uk/nisi/1994/426/contents/made>

<sup>22</sup> George Best Belfast City Airport (2009) *Environmental Noise Directive Noise Action Plan*, p.9.