



## **How to minimise aircraft noise *and* boost Northern Ireland's economy**



**Common sense solutions from Belfast City  
Airport Watch**

## Introduction

**More than 50,000 people in Belfast and north Down are already affected by aircraft noise at an undesirably high level**, thanks to the operations of George Best Belfast City Airport. <sup>1</sup>

Now the airport wants to expand further and relax noise controls which aren't even being properly enforced. Belfast City Airport Watch is urging the Northern Ireland Executive to reject these proposals.

But there are other measures which the Executive could take which would help create a better balance between the commercial interests of airports, and the health and quality of life of residents. Our proposed package of measures could also boost Northern Ireland's economy by strengthening the aviation sector in the face of growing competition from Dublin Airport. We want to see:

- ✓ **An independent aircraft noise regulator**
- ✓ **Tough noise fines for airlines**
- ✓ **An airports strategy for Northern Ireland**
- ✓ **The proper implementation and enforcement of airport planning agreements, including the existing George Best Belfast City Airport agreement**

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## What's the problem?

Tens of thousands of people live under or close to the airport's flight paths; **the airport's own figures show that 51,910 people are already impacted by aircraft noise at an undesirably high level in Belfast and north Down.**<sup>1</sup>

Even in 2014, **the number affected by City Airport's operations at the level considered by the UK government to cause serious community annoyance (4,107) was greater than Gatwick Airport (3,550) and Stansted Airport (1,400).**<sup>2</sup>

If the airport's proposals go ahead and noise levels rise to their permitted maximum, **City Airport would become the *fourth noisiest airport* in the UK in terms of population impact, alongside Birmingham – only Heathrow, Manchester and Birmingham would affect more people at or above the government's 'significant annoyance' threshold.**<sup>3</sup>

We're very concerned that **airports monitor their own noise levels and produce their own 'Noise Action Plans', allowing for a clear conflict of interest.** No other industry

is permitted to self-regulate noise pollution or any other form of pollution in this way.

## Don't people just get used to aircraft noise?

There's already robust evidence that City Airport's operations are having a seriously detrimental impact on health, quality of life and education.

We commissioned an independent survey of people living under or close to the airport's Belfast flight path which found<sup>4</sup>:

- **38% described the noise from aeroplanes, when at home, as 'very high'** – only 4% described the noise from cars as 'very high'
- **More than half (51%) said planes interrupted their conversations when outdoors**
- **Nearly a third (31%) said planes made their own outdoor spaces (gardens, backyards etc) less pleasant to be in**
- **1 in 4 (25%) said that planes woke them up and/or stopped them getting to sleep**
- **20% of those with kids aged 11 or under said their children's sleep was affected**

But aircraft noise can have a serious impact on health, regardless of the effect on sleep.

As a recent report for the UK government's Airports Commission observed, there is a growing body of international evidence which indicates that **greater exposure to aircraft noise leads to poorer cardiovascular health.**<sup>5</sup>

The impact on children isn't just confined to the home. In a survey of schools undertaken by Belfast City Airport Watch:

- **12 schools said pupils' concentration was adversely affected by aircraft noise**
- **9 schools said aircraft noise disrupted teaching and/or classes**<sup>6</sup>

Indeed, a major international study has found that **exposure to aircraft noise is related to impaired performance in reading comprehension and recognition memory in schoolchildren.**<sup>7</sup>

## But isn't all airport growth good for the economy?

There's no good evidence to support this argument. **If the City Airport succeeds in expanding further, it's likely to be at the expense of Belfast International Airport – which would simply mean a transfer of both passengers and jobs from one local airport to the other.**

And **the ultimate winner** of any such unregulated duplication of services **would probably be Dublin Airport.** In 2014, **864,000 people from Northern Ireland used Dublin Airport, up 52% on 2013.**<sup>8</sup> While the top destination **for Northern Ireland travellers using Dublin** was New York JFK, **the second and third leading destinations were London Heathrow and Manchester, also served by Belfast City and International Airports.**

Any further strengthening of Dublin Airport at the expense of our own airports will only lead to greater numbers of Northern Ireland passengers shunning local airports and using Dublin instead, and will also lead to greater numbers of inbound tourists

entering the island of Ireland through that particular point of entry, and then being much less likely to come north of the border as a result.

Indeed, in a recent consultative paper, the Airports Commission commented:

“It may be argued that ... *larger airports serving bigger catchment areas could attract a wider range of services, enhancing route networks and other services* [than a number of small ones].”<sup>9</sup>

The European Commission has also warned against “... *a proliferation of regional airports which leads to the duplication of unused or not efficiently used airport infrastructure* ...”<sup>10</sup>

If expansion of aviation capacity in Northern Ireland is thought to be desirable, the logical terminal for that expansion is Belfast International Airport which has many advantages over City Airport. **Unlike City Airport, International Airport:**

- **has plenty of spare capacity, with two runways**
- **can operate 24 hours a day, and handle freight and long haul flights**
- **is located on a greenfield site with minimal noise disturbance for residents**

The enormous contrast in the noise impact of both airports is demonstrated by the comparative noise impact figures which each airport published in their current Noise Action Plans 2013 – 18 which they were required to produce to comply with EU legislation. These showed that:

- **While just 897 residents are affected by aircraft noise linked to BIA’s operations**, as previously noted, **no less than 51,910 people are affected by noise from the City Airport’s flights**<sup>11</sup>

## Our solutions

It’s imperative that the Northern Ireland Executive doesn’t allow George Best Belfast City Airport’s proposals to go ahead. But there’s a great deal more which the Executive could do to help achieve a better balance between the commercial interests of our airports, and the health and quality of life of local residents, while also helping to boost the economy.

We’re asking the Executive to implement the following:

- ✓ The establishment of an **independent aircraft noise regulator**, similar to the Authority for the Control of Airport Pollution (ACNUSA) in France<sup>12</sup>, backed by appropriate expertise and resources, and part-funded by airlines, with powers to:
  - Provide **robust monitoring of aircraft noise** and ensure conformity with all relevant noise control measures, including planning agreement clauses, Noise Action Plans and noise abatement procedures

- Recommend to the relevant Northern Ireland Executive department the enforcement of **mandatory flight paths** and **usage restrictions on certain flight paths** to help minimise noise
  - Deal effectively with public complaints
  - Impose **tough fines** on airlines which flout agreed noise levels or procedures, with fines set high enough to demonstrably provide a deterrent, and proceeds helping to fund the regulator's work
  - The production of **meaningful 5-year Noise Action Plans** for each airport which minimise noise pollution, where noise impact is low, and which reduce noise pollution, where noise impact is high
  - Have a statutory responsibility to monitor trends in aircraft noise, and to **advise the relevant Northern Ireland Executive department on how changing attitudes to aircraft noise, and the growing body of evidence on the health and educational impacts of aircraft noise, should be incorporated into Executive policy**
- ✓ The development of **an airports strategy for Northern Ireland** which will:
- Provide the right balance between the commercial interests of airports, and the health and quality of life of local residents
  - Focus any future expansion of international routes at Belfast International Airport, the logical 'regional gateway' air terminal for international flights
- ✓ **Proper implementation and enforcement of the current Belfast City Airport planning agreement, and rejection of the Airport's requested changes**

*The Northern Ireland Executive faces a choice. It can continue to permit the piecemeal expansion of airports, allowing them to duplicate provision and permitting Belfast City Airport to become one of the noisiest airports anywhere in the UK and the island of Ireland. The only winners will be Dublin Airport and the airlines, while the losers will be our local economy, and the health and quality of life of tens of thousands in residents in Belfast and north Down.*

*Alternatively, the Executive can put in place a robust economic and regulatory framework which allows our aviation industry to compete effectively with and complement Dublin Airport's growing portfolio of routes, while ensuring that the negative impacts of aircraft noise are kept to an absolute minimum.*

## About Belfast City Airport Watch

Belfast City Airport Watch Ltd. is an umbrella group of 13 residents' and community associations, and one trade union branch, and 763 individual supporters, all of whom oppose further expansion of George Best Belfast City Airport. The group operates as a not-for-profit company, limited by guarantee.

For more information and to sign up as a BCAW supporter, visit our website:

[www.belfastcityairportwatch.co.uk](http://www.belfastcityairportwatch.co.uk)

E-mail us at: [info@belfastcityairportwatch.co.uk](mailto:info@belfastcityairportwatch.co.uk)



## Footnotes

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<sup>1</sup> The airport's *Noise Action Plan 2013 – 2018*, Table 8, shows that a total of 51,910 people are affected by aircraft noise at a level of 50 LAeq 16h or above. Current Building Standards regulations (BS8233: 2014) state that it is desirable that noise in gardens and patios is at or below 50 LAeq.

<sup>1</sup> op. cit.

<sup>2</sup> GBBCA figure is from Bickerdike Allen *George Best Belfast City Airport. Airborne Aircraft Noise Contours 2014*, Table 6. Other figures from Jacobs *5. Noise Baseline*, Nov. 2014. Prepared for Airports Commission, Table D.1

<sup>3</sup> This comparison is based on the figures given in Jacobs, op. cit. and the 'unconstrained scenario 2025' projection contained in GBBCA's application to amend its Planning Agreement. The latter estimates that 18,100 people would be affected at or above 57 dB LAeq 16h under the 'unconstrained scenario' if GBBCA's application is successful. Jacobs, Table D.1 shows that Birmingham affects 18,500 people at this level, while only Heathrow, London City and Manchester affected a greater number at this level.

<sup>4</sup> The survey was carried out in August 2012 by the market research firm, Perceptive Insight. Using a survey questionnaire, it carried out face-to-face interviews with a representative sample of 423 people living under or close to the airport's Belfast approach path. 2012 was the least noisy year within recent years, according to the airport's own noise monitoring figures which show 3,728 people affected by noise at or above the level considered to cause 'significant community annoyance' by the UK government – well below the 18,100 which could be affected at or above that level if the airport's proposals go ahead. The summary of survey results in this briefing paper refers to impacts (e.g. on sleep) which were reported by respondents as happening 'quite often' or 'very often'. BCAW is grateful to the charitable trust, Lush Charity Pot, for a grant which paid for the commissioning of this survey.

<sup>5</sup> Clark, C. (2015) *Aircraft noise effects on health*, p. 2. Report prepared for Airports Commission.

<sup>6</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>7</sup> Clark, C. (2015) *Aircraft noise effects on health*, p. 2. Report prepared for Airports Commission.

<sup>8</sup> See: <http://www.u.tv/News/2015/05/14/More-NI-passengers-using-Dublin-Airport-37264>

<sup>9</sup> Airports Commission (2014) *Discussion Paper 06: Utilisation of the UK's Existing Airport Capacity*, p. 29.

<sup>10</sup> European Commission, 'Commission adopts new guidelines on state aid to airports and airlines', p.5.

<sup>11</sup> The figures are taken from Belfast International Airport *Environmental Noise Directive Belfast International Airport Noise Action Plan 2013 – 18*, Table 3.3 and George Best Belfast City Airport *George Best Belfast City Airport – Environmental Noise Directive – Round Two – Noise Action Plan 2013 – 2018*, Table 8. The figures refer to the number of people affected by noise at 50 LAeq or above. See also note 2 above.

<sup>12</sup> See ACNUSA's website at: <http://www.acnusa.fr/en/> The Department for Regional Development has legal powers under the Airports (NI) Order 1994, Clauses 21 and 22, to impose noise control measures which we believe could be used, potentially, to provide any necessary legal underpinning to the regulator's powers. Note that ACNUSA oversees and makes recommendations on airport noise monitoring processes. However, we believe that noise monitoring should be carried out independently of airports, due to the clear conflict of interest. Therefore, we are seeking greater powers than those currently held by ACNUSA.