



Response to Stansted Airport Draft Noise Action Plan 2024-2028

25 August 2023

Stansted Airport Watch (SAW), formerly Stop Stansted Expansion (SSE), was established in 2002 in response to Government proposals for major expansion at Stansted Airport. Our objective is to contain the development of Stansted Airport within tight limits that are truly sustainable and, in this way, to protect the quality of life of residents over wide areas of Cambridgeshire, Essex, Hertfordshire and Suffolk, to preserve our heritage and to protect the natural environment.



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Introduction

This document is the response from Stansted Airport Watch ('SAW') to the Manchester Airports Group's ('MAG') consultation on the Stansted Airport ('STAL') draft Noise Action Plan ('NAP') 2024-2028. SAW welcomes all efforts to reduce the environmental noise harms and adverse health impacts for people living around the airport and under the flight paths. There is growing evidence of the social cost associated with the adverse impacts of aircraft noise, particularly at night. Adverse health effects from noise are well established including particularly poor performance at work from interrupted sleep and impaired cognitive development in primary school children who live and/or attend schools near airports. These adverse effects mean that there is not only a social cost but also an economic cost to the nation which can be directly attributed to aircraft noise.

Background

The previous time Stansted Airport prepared a NAP (for 2011-2016), the following noise metrics were used:

- 55dB Lden (24-hour day/evening/night)
- 48dB Lnight (8-hour night)

This previous NAP failed to achieve the EU Noise Directive END 2002/49/EC objective "*to avoid, prevent or reduce the harmful effects of exposure to environmental noise*". Both the 55dB Lden and 48dB Lnight noise metrics increased in areas and numbers of population affected over the 5-year period from 2011 to 2016. Over the course of these five years, the number of people within the 55dB Lden contour increased by 1,300 (18%) to 8,700 and within the 48dB Lnight contour by 400 (7%) to 6,300. This did not avoid, prevent or reduce noise exposure as set out by the EU Directive – quite the reverse.

SAW's position

The draft NAP 2024-2028 must not repeat the failings of the previous Plan. Our main criticism of Stansted Airport's draft NAP is that it lacks ambition. It contains 50 so-called "actions" but these are generally of a minor nature and many are quite meaningless. All too often STAL only gives a commitment "to consider", "to review", "to monitor" or "to discuss", and so on.

The commitments need to be much more meaningful and more ambitious.

A key test of this new draft NAP 2024-2028 must be that the airport commits to reducing the areas and numbers of people affected during the course of the five-year cycle and that this is not only monitored but that any breach is appropriately rectified or penalised.

Noise complaints

Since MAG has owned the airport, the number of complaints per 1,000 air traffic movements in the years up to 2021/22 has continued to increase, as shown below:

2013/14	5.7
2014/15	7.6
2015/16	5.1
2016/17	34.4
2017/18	48.3
2018/19	68.0
2019/20	42.5
2020/21	86.9
2021/22	76.9

This trend must be reversed for those local residents affected.

Detailed response

It is clear from Figures 3 and 4 in the airport's draft NAP, that the areas and population affected by airport noise increased between 2011 and 2016 and that while 2021 showed a reduction, this must be seen as a result of Covid impacts which reduced the number of movements in 2021 to less than half the pre-Covid levels.

There is no information provided for the Airspace Modernisation Programme and how this will impact and affect flight paths for Stansted Airport. Without this information, it is impossible to fully assess the effects of the draft NAP.

There are no estimates given for the reduction of the number of people affected (annoyed, sleep-disturbed, or other) as the outcome of the draft NAP. This is in direct contravention of the requirement in Appendix V to the EU Noise Directive END 2002/49/EC as one of the minimum requirements of NAPs.

As stated above, so many of the actions in the draft NAP are merely commitments "to consider", "to review", "to monitor", "to discuss" etc. These are not real actions. Here is an example of a more meaningful action that could be taken, and would be quick and easy to implement:

Example

When aircraft have just landed or are waiting to depart, they need a supply of electric power. They can either use the aircraft's own auxiliary power unit (APU), which can be extremely noisy, or they can plug in to the airport's fixed electrical ground power (FEGP), which is silent. In this regard, all that STAL proposes to do to limit noise from ground operations is set out in NAP 9 as follows "*we will maintain published guidance on the use of fixed electric ground power (FEGP) and monitor the non-essential use of auxiliary power units (APUs)*".

STAL charges between £13.91 and £30.62 for the use of FEGP, which may discourage some airlines from using it. A more meaningful commitment would be to provide FEGP free of charge, paid for by an across-the-board increase in the charge per landing and departure.

We maintain that the draft NAP must be far more ambitious and that the key actions needed to reduce noise are:

- ❖ Phase out all night flights over the five-year period of the plan (bearing in mind that Stansted has more than twice as many night flights as Heathrow);
- ❖ Ban the use of reverse thrust, i.e. putting engines into reverse to increase braking on landing. This is very noisy and it is unnecessary with Stansted's two-mile runway;
- ❖ Ban the noisiest (QC4) aircraft - as proposed by the Government in 2021;
- ❖ Immediately double the fines on airlines for breaches of noise limits and not adhering to designated flight tracks, then double the fines again during the five-year plan;
- ❖ Give a clear commitment to reduce, each year for the next five years, the number of households adversely affected by aircraft noise – for all the airport noise contours; and
- ❖ Provide quantified and measurable noise reduction targets with timescales, such as noise contour reduction percentages using a range of metrics.

Conclusion

Stansted Airport should revise its draft NAP 2024-2028 to incorporate the key actions given above before submitting the draft Plan to the Government for approval.