

COMMENTS BY STANSTED MOUNTFITCHET PARISH COUNCIL IN RESPONSE TO THE PUBLIC CONSULTATION ON THE STANSTED AIRPORT DRAFT NOISE ACTION PLAN 2024-28

In relation to the current consultation our comments are as follows:

Section 4 Noise Mapping

"The contour maps cover the 16-hour day (07:00 to 23:00) and 8-hour night (23:00 to 07:00), are based on 92 days' data, and are presented in terms of the 'A-weighted equivalent continuous noise level' (LAeq)" (extract from page 12). Stansted Mountfitchet Parish Council calls on STAL to instead adopt the finding in the CAA's SONA 14 noise attitude survey that "an equivalent continuous level is not consistent with people's perception of aircraft noise as a number of discrete, noticeable events."

Section 12 Night Noise

"The seasonal nature of flights at Stansted Airport means that the headline movement limit imposed by the Government is overrun in the summer season, but significant headroom remains in the winter season. As a result, we make use of the seasonal flexibility provided within the Government controls. This allows us to exceed the summer season limit, provided we reduce the winter season limit by a corresponding number."

The above extract from page 58 of the draft NAP highlights the complete disregard STAL has for the effects of the noise pollution it imposes on the community around the airport. These breaches of Government set movement limits for the night-time period in the summer months have been a regular feature since 2016, with the exception of the pandemic affected years 2020-2021, and have sharply increased in scale in 2022. During the summer months when residents typically retire to bed with windows open, night noise disrupts their sleep with all the attendant health implications which are widely recognised. STAL's only response is to say that it will continue to exceed the limit in summer, and will use the headroom within the movement limit for the winter months (when windows are typically closed) to offset such breaches. This is not an Action Plan. To the contrary, it is a plan for inaction with continuing breaches of Government-set limits.

Quieter aircraft vs more flights

The Noise Action Plan is peppered with references to airlines investing in new aircraft which bring technological enhancements in engine and airframe design making them significantly quieter and reducing their "quota count classification". There is not a single reference to the "elephant in the room", namely the increase in the number of flights which is forecast to occur over the coming years (see attached Table A1.14 from the Stansted Generation 1 ES Vol 16 Traffic Forecasts).

At 11 o'clock at night when people are trying to get to sleep, or at 5 o'clock in the morning when they do not want to be woken up, it is doubtful they would appreciate the difference between a QC 0.5 and a QC 0.25 aircraft taking off or landing. What they will indisputably notice is the significant increase in the number of flights during these critical "shoulder periods" of the airport's operations.

What Table A1.14 shows is that over a period of time the environment around the airport will become saturated with aircraft noise as the single runway is increasingly used to its maximum capacity of roughly 50 flights per hour. This means that any respite from such noise will gradually disappear.

There are no estimates given for the reduction of the number of people affected (annoyed, sleep-disturbed or other) as the outcome of the Noise Action Plan (NAP). This is direct contravention of the EU Noise Directive End 2002/49EC, Annex V, Minimum Requirements for Action Plans.

There is a plethora of so-called actions listed in the draft NAP but far too many of these commit STAL only “to consider,” “to review,” “to monitor” or “to discuss.” The commitments need to be much firmer, more meaningful, and more ambitious than that.

WHAT SMPC EXPECTS STAL TO COMMIT TO ACHIEVING IN 5 YEARS

- Ban the noisiest (QC4) aircraft day or night as proposed by the Government in 2021 within five years.
- Give a clear commitment to reduce, each year for the next five years, the number of households, excluding new development, adversely affected by aircraft noise – for all airport noise contours.
- Publish quantified measurable noise reduction targets with timescales, such as noise contour reduction percentages using a range of metrics.
- Give a clear commitment to encourage the operators to reduce the use of reverse thrust (emergencies are excluded).
- Engage with the local community to discuss the feasibility of reducing night flights.
- In addition to monitoring non-essential use of auxiliary power units, meaningful enforcement penalties should be built into contracts with operators.

Airport Working Group
September 2023

Table A1.14: Hourly Aircraft Movements on a Busy Day*, 35mppa 2014

Hour beginning GMT	Arrivals					Departures					Two Way				
	PATM	CATM	ATM	Non ATM	TOTAL	PATM	CATM	ATM	Non ATM	TOTAL	PATM	CATM	ATM	Non ATM	TOTAL
0	1	0	1	0	1	0	0	0	0	0	1	0	1	0	1
1	1	0	1	1	2	0	0	0	0	0	1	0	1	1	2
2	0	3	3	0	3	0	0	0	0	0	0	3	3	0	3
3	0	3	3	1	4	0	1	1	0	1	0	4	4	1	5
4	0	0	0	0	0	2	3	5	1	5	2	3	5	1	5
5	10	1	11	1	12	32	0	32	1	33	42	1	43	2	45
6	15	0	15	1	16	29	1	30	0	30	44	1	45	1	46
7	19	0	19	1	20	25	0	25	0	26	45	0	45	1	46
8	21	0	21	1	21	23	0	23	1	24	44	0	44	1	45
9	23	0	23	0	23	21	0	21	1	22	44	0	44	1	45
10	24	0	24	0	24	24	0	24	1	25	48	0	48	1	50
11	21	0	21	1	22	25	0	25	0	25	46	0	46	1	47
12	18	1	19	1	20	19	0	19	1	21	37	1	38	2	40
13	24	0	24	1	25	15	1	16	2	17	39	1	40	3	43
14	22	3	25	0	26	22	0	22	1	23	44	3	47	1	49
15	16	3	19	2	21	23	1	24	1	25	39	4	43	3	46
16	19	4	23	2	24	19	1	20	1	21	38	5	43	3	45
17	24	1	25	1	26	23	0	23	1	24	47	1	48	2	50
18	21	0	21	2	23	24	1	25	0	25	45	1	46	2	48
19	18	1	19	1	20	18	6	24	2	25	35	7	42	3	45
20	18	2	20	1	21	17	4	21	1	22	35	7	42	2	43
21	31	1	32	0	32	6	6	12	0	12	36	7	43	0	44
22	21	2	23	0	22	1	2	3	0	4	22	4	26	0	26
23	2	2	4	0	4	1	3	4	1	5	3	5	8	1	9
TOTAL	368	28	396	19	415	370	30	400	15	415	738	58	796	34	830

* Average July Friday