

East Midlands Airport **Noise Action Plan**

Summary Report



EAST MIDLANDS AIRPORT DRAFT NOISE ACTION PLAN:**SUMMARY REPORT****1 INTRODUCTION****1.1 Statutory Framework**

This summary of the EMA Noise Action Plan (NAP) has been prepared in accordance with the requirements of Section 18 of the Environmental Noise (England) Regulations 2006 (as amended), which transposed the EU Environmental Noise Directive (2002/49/EC), known as END, into UK legislation. It takes full account of Guidance issued by the Department for Environment, Food and Rural Affairs (Defra).

Noise Action Plans (NAPs) are designed to manage noise impact arising from aircraft departing from and arriving at specified airports, including East Midlands Airport (EMA). Noise impact is identified by using Strategic Noise Maps which were approved by Defra and have been included in the full NAP. The assessment process requires airports to consider the current noise impact of their operations, as shown by the Strategic Noise Maps together with the current control measures they have in place, and then to come to a view as to whether or not the current impact is acceptable. If it is considered acceptable, then it can be assumed that the current control measures are adequate, if not, then further action is required.

East Midlands International Airport Limited, which is part of the Manchester Airports Group, is the authority responsible for the NAP, including this Summary Report. We welcome the opportunity that the NAP process has provided to review our existing package of mitigation measures.

1.2 Time Frame

The timetable for the production of NAPs was specified by Defra. EMA has proceeded in accordance with this timetable.

- Formal consultation on draft Noise Action Plan commences: 1 July 2009
- Formal consultation ends: 21 October 2009
- Draft Noise Action Plan submitted to Government 30 November 2009

1.3 Public Consultation

The Defra Guidance lays down specific requirements on public consultation which we have followed. On completion of the consultation, EMA carefully considered all responses and comments received. We published a separate report on consultation, which summarised the key themes that emerged and our response to them. We revised the Draft NAP in the light of these responses and comments as appropriate.

The Airport wishes to put on record it's thanks to all those who responded and attended our Outreach Events. A special thanks is due to members of our Independent Consultative Committee who were involved at all stages of the NAP exercise.

If approved by the Government, our Submission Draft NAP will become the formal EMA Noise Action Plan and will be published in electronic format. This summary document will be made available in both electronic and paper formats as will the report on consultation. The report on consultation will also be made available in electronic format.

1.4 Monitoring and Review

We are fortunate in that our assessment and evaluation of progress on implementing our noise controls, undertaken for our Master Plan Monitoring and Implementation Report published in April 2009, has been able to inform the NAP process. We would like to bring monitoring and review of both processes together in one comprehensive over-arching approach as discussed in the full NAP report.

2 EXISTING FRAMEWORK

2.1 Description of the Airport

EMA is located in the Three Cities Sub-Region of the East Midlands. It is located in a largely rural area, roughly equidistant from the cities of Nottingham, Leicester and Derby. Several villages are located relatively close to the Airport.

It has one of the largest catchment areas of any UK airport with 10.8 million people living within ninety minutes' drive. It enjoys a strategic position in the centre of the country with excellent links via an adjacent motorway network to the rest of the UK – over 89% of mainland England and Wales is within 4 hours truck driving time. This central location, away from the main concentrations of population, makes it particularly suitable as the UK's leading express freight hub.

EMA carried 5.6m passengers and handled 295,000 tonnes of cargo in 2008. Today the Airport is the 12th largest passenger airport in the UK; the largest "pure freight" airport in the UK, "pure" freight being freight carried in dedicated freighter aircraft; the second largest airport in the UK for freight overall; the UK's leading airport for express freight; Royal Mail's largest UK hub for flown mail and the main centre of UK operations for DHL and UPS; and a major regional employer with some 6,500 people working directly for more than 100 companies located on or near the Airport site.

The Future of Air Transport White Paper (ATWP) forecast that by 2030, EMA could attract between 12-14 million passengers per annum and be handling 2.5 million tonnes of freight a year. For this to happen, the White Paper stipulates that any expansion of the Airport must be accompanied by stringent controls, on night noise in particular.

2.2 Managing the Impact

Managing the environmental impact of our operations in a responsible and effective manner underpins everything we do. We recognise that the Government's support for the Airport's future growth is subject to stringent controls on night noise in particular and other mitigation measures. This means that the potential environmental impact, especially the effects of night flying, has a particular significance for us.

We remain proud of the fact that in 2002, EMA became the first airport in the UK to be certified to the ISO14001 international environmental management standard and we are committed to maintaining this certification. Our long-term noise control strategy is set out in Chapter 7 and Appendices 4 & 5 of our Master Plan and the effectiveness of these measures has been validated by the NAP process..

2.3 Regulatory Framework

In seeking to minimise the impact of aircraft noise, the Airport is bound by the Government's regulatory framework which follows the principles set out by the International Civil Aviation Organisation, known as the "balanced approach". In summary, this requires the consideration of the contribution to noise amelioration that can be made by each of the following measures: firstly reducing aircraft noise at source; then by land-use planning; noise abatement operational procedures; and finally restrictions on the use of the noisiest aircraft.

This is part of the Government's overall "control, mitigate and compensate" approach.

2.4 EMA Noise Control and Mitigation Strategy: Implementation Progress

Progress on implementing our noise control strategy over the last 3 years since the Master Plan was approved has been substantial as outlined below. For a comprehensive assessment see the full NAP report.

2.4.1 Control of Noise at Source

There has been a significant improvement in the noise environment around the Airport in recent years with the night noise contour (57dB(A)_{L_{AEQ,8h}}) reducing to roughly 65% of its 1996 level, as of 2008. Despite the substantial increase in passenger and freight operations forecast for the Airport, we are committed to ensure that night noise remains at, or below the 1996 night noise contour level (14.6km²), until at least 2016.

The Airport has sought to encourage its airline customers to use the quietest aircraft. The results have been encouraging with DHL's replacement of its older Boeing 727 aircraft with quieter Boeing 757s in 2003 and the replacement during 2009 of MD-11 operations by new Boeing 767 and 777 aircraft. Ryanair has phased out its older Boeing 737-200 aircraft in favour of the new generation Boeing 737-800 models. The Airport continues to encourage airlines to replace their existing fleets with quieter models.

Progress on Master Plan key targets and limits are listed below:

- Whilst it increased from 7.9 sqkm in 2006 to 9.5 sqkm in 2007, the night noise contour remains well below the target level of 14.6 sqkm. We are confident that we can maintain the night noise contour at or below the 1996 target limit until 2016.
- The aim that by 2012 all aircraft operations at night will comply with the requirements of the most stringent international noise standard, "Chapter 4", is on target to be achieved.
- The noisiest aircraft (those attracting a QC of 8 or 16) are no longer permitted to operate at night except for those that suffer an unavoidable delay, provided a punitive surcharge of £10,000 or £5,000 (subject to the QC of the aircraft) is paid. This measure has been enforced since January 2007 and has been so effective that there was only one such aircraft movement in 2008.
- The more stringent night noise penalty scheme limits and the Night Noise Surcharge have been introduced, effectively reducing each noise limit by 2 decibels. In 2008 22 penalties were issued, raising a total of £22,050, which was transferred in full to the Airport's Community Fund.

2.4.2 Land-use Planning

Traditionally the physical development of the Airport has been along an east/west axis south of the existing runway, east of the M1 and north of the A453. Our assessment of development options undertaken for the Master Plan using 10 sustainability criteria including noise, confirmed that this broad development strategy should continue where possible, thus minimising any change to the overall character of land-use, new land-take and noise.

2.4.3 Operational Procedures

There has also been excellent progress on implementing the new operational procedures proposed by the Master Plan as listed below.

- Raising the minimum altitude limit at which departing aircraft are permitted to deviate from their noise preferential route from 3,000 feet to 5,000 feet was implemented in January 2007. Compliance is excellent and is now running at 98%.
- The Continuous Descent Approach (CDA) target for arriving aircraft of 80% has been achieved and surpassed. In 2008 average CDA compliance was 84% compared with 75% in 2006 and performance continues to improve.
- Additional limits on training by civil jet aircraft have been implemented. The intrusiveness of training operations was a strong theme arising from consultation on the Draft Master Plan. Since the extension of the restrictions the number of complaints associated with training flights has fallen by 85%.
- During 2007/08 the Airport installed a new permanent noise monitor at Castle Donington which brings the number of permanent monitors to five in addition to the portable noise monitor which, upon request, is available to be located in local communities to monitor the levels of noise at specific locations.
- During 2007/08 further improvements were made to the Webtrak system in response to feedback, making it easier to use. The Airport was the first in Europe to introduce this web-based system. It allows anyone with access to the Internet to replay aircraft movements within 30 miles of the Airport and up to 15,000 feet. For each aircraft that has arrived at or departed from EMA there is detailed information including aircraft type, airline, altitude and track.

It is these measures which have contributed significantly to minimising the noise impact of operations at the Airport.

2.4.4 Mitigation

Given its largely rural location, EMA's noise impact on surrounding communities, particularly in terms of people affected, is modest compared with most other airports. A review of our Sound Insulation Grants Scheme (SIGS) was carried out to inform the Master Plan process. This proposed among other things, the extension and enhancement of the SIGS to cover more people who live near the Airport as it grows. This includes increasing the basic SIGS by £1,000 to a maximum of £3,000 for houses in the 55dB (A) LAEQ,8hr contour limit.

The enhanced scheme as proposed in the Master Plan has been fully implemented. The offer is the most generous of any UK airport and take-up has been strong. By the end of 2008, 502 dwellings had received Sound Insulation Grants.

2.5 Noise Complaints

EMA takes noise complaints very seriously. The complaint handling system is independently audited as part of the ISO14001 certification. Our Environment team aims to respond to all complaints within 10 working days of receipt of the complaint. During 2008 we received 2,632 complaints from 321 complainants and 2,275 of these were about aircraft noise. Between 2006 and 2008 the number of complaints fell sharply by 67% and the number of people complaining fell by 43%. In 2008 70% of our complaints were from 11 complainants. We accept however that a falling number of complaints does not necessarily indicate a commensurate fall in concerns about the noise environment within local communities.

2.6 Limit Values in Place

The Airport is not subject to aircraft movements limits. Our control measures are set by the Airport having regard to comprehensive consultation and the views of our Independent Consultative Committee. The key limit values in place are:

- the commitment to ensure that for the foreseeable future (up to 2016) the night noise contour will not exceed the area covered by the 1996 night noise contour (specifically 57dB (A) $L_{Aeq,8h}$), an area of 14.6 sqkm;
- noise contours also provide the framework for determining eligibility for our Sound Insulation Grants (SIGS);
- noise levels provide the operational framework for setting and monitoring compliance with noise penalty limits;
- the noisiest aircraft movements (those attracting a QC of 8 or 16) are not permitted to plan to operate at night;
- altitude limits help to provide the operational framework for Continuous Descent Approach; and
- training (by civil jet aircraft) is prohibited at night and on Saturdays, Sundays and Public Holidays and in any event restricted to those airlines that undertake regular operations from EMA.

2.7 Financial Aspects

Although there is no overall budget to implement our noise control measures, the costs are substantial and vary enormously in scale depending on the measures involved. The replacement of existing aircraft fleets with quieter models, for example, falls to the airlines and can involve hundreds of millions of pounds of new investment but, of course, the benefits do not accrue solely to EMA.

The Airport has made a considerable investment in the installation of new technology such as noise and track-monitoring equipment, radar recording and display systems such as Webtrak. By way of illustration, since the publication of the Master Plan our investment in Sound Insulation Grants alone has been some £1.5m. Surcharges and noise penalties are met by the relevant airlines and these monies are transferred to assist community projects through our Independent Community Fund, to which the Airport commits £50,000 annually. Ongoing costs, borne by the Airport, associated with maintaining ISO14001 are not inconsiderable and measures such as restrictions on training aircraft have also a cost in terms of income foregone. The overall affordability of all of the measures put in place to manage the environmental impact of the Airport's operations is a key consideration for EMA.

2.8 Assessing the Significance of Noise Exposure

In order to determine the acceptability or otherwise of noise exposure, the Defra Guidance considers the key source of information to be the White Paper, "The Future of Air Transport", December 2003, commonly known as the Air Transport White Paper (ATWP). With respect to daytime noise the White Paper considers that, on the basis of social research, a continuous equivalent noise level of 57 decibels (57dB (A) $L_{Aeq,16h}$) should be taken as the "onset of significant community annoyance".

The Guidance considers that further information on interpreting noise levels can be obtained from the Government's Planning Policy Guidance document, PPG 24 on Planning and Noise. This document was originally designed to assist those determining planning applications for

new developments. It provides guidance based on noise bands, categorised by day and night.

With regard to night noise, PPG 24 accords significance to regular exposure to noise levels in excess of 82dBI max (equivalent to 90dB(A)SEL). This value is based on the results of field research undertaken for the Government in the 1990s, which found that at noise levels of less than 90dB(A)SEL there was no discernable effect on levels of sleep disturbance.

These guidance values are well established and well founded and have for many years guided the Airport in its consideration of its annual noise contours, the more recent noise maps used in the noise mapping exercise which underpins the NAP process and in driving programmes of mitigation, such as the Sound Insulation Grant Scheme. We are aware, however, that there is great deal of research in this area and the recent study into attitudes to aircraft noise therefore merits special consideration.

2.9 Attitudes to Noise from Aviation Sources in England (ANASE)

This study was published in late 2007 and is considered in detail in the full NAP report. Its main conclusion is that people seemed to be annoyed by aircraft noise at lower levels than was the case previously. However, the methodology of the study has been subject to considerable technical criticism. We welcome the study but look to the Government to clarify the weight which should be given to the research findings and how they might contribute to the development of policy.

3 THE STRATEGIC NOISE MAPS

3.1 Introduction

The END requires member states to produce noise exposure information in the form of strategic noise maps utilising common noise indicators. Five such maps have been prepared by Defra: the Lden and Lnight and the supplementary indicators Lday and Levening. In addition a “traditional UK” noise map based on indicator $L_{Aeq,16h}$ has been prepared. All 5 maps are provided in the NAP report, along with an explanation of how they have been derived, and all have been subject to public consultation.

3.2 Summary of the Results of the Strategic Noise Mapping Exercise

The NAP must consider those areas impacted by significant levels of aircraft noise and the Guidance advises that in this context “significant” means “those places affected by noise from the Airport operations as shown by the results of the noise mapping.”

The noise mapping exercise shows that this is confined primarily to those villages closest to the Airport, principally Kegworth, East Leake, and parts of Castle Donington, Melbourne and Sutton Bonington. This unsurprisingly confirmed the findings from the more comprehensive analysis undertaken for the Master Plan based on 23 noise maps, and subsequent work undertaken by the Airport, including the annual noise contours.

In summary, all the strategic noise maps tend to show a similar characteristic shape which expands or contracts depending on the indicator used and the decibel value. Perhaps the most significant point is that the Lden tends to produce larger contours than the other indicators. This is because the noise which occurs in the evening and at night attracts an artificial weighting of 5dB and 10dB respectively before being combined to produce Lden (see the full NAP report for a detailed explanation).

It is clear that the noise contours on the maps produced as a result of the strategic noise mapping exercise are the same shape as those which have been produced and published by the Airport for many years. Crucially the noise maps do not identify areas of noise exposure which have not been considered in formulating the current noise amelioration programme.

3.3 Population and Dwelling Exposure Statistics

Defra has made available population and dwelling exposure statistics based on the five strategic noise maps. This confirms that the map based on the Lden indicator is the most extensive: there were 4,350 dwellings and an estimated 10,500 people exposed to noise levels equal to or greater than 55 decibels (Lden). On the other hand, at the slightly lower noise levels of 54 decibels or greater the figures for the Lnight and the Lday based maps are much lower at 950 dwellings and 2,100 people, and 1000 dwellings and 2,200 people, respectively.

Defra has also made available population exposure information for a selected group of UK airports including EMA. (See Appendix 3B of the NAP). This data is useful for making comparisons between airports.

4 LOOKING AHEAD

4.1 The Future of Air Transport White Paper (ATWP)

Having taken account of a range of factors including environmental matters, climate change, economic development and employment issues, the ATWP concludes that air travel is essential to the UK's economy and to our continuing prosperity.

It seeks to encourage the development of regional airports, including EMA to support the growth of their regional economies and to provide passengers with greater choice by offering more direct flights from the UK regions. It also supports growth at regional airports to relieve congestion at overcrowded South-East airports by making better use of existing regional capacity; and to reduce the need for long-distance surface travel to and from airports by improving more local services.

The ATWP supports the expansion of passenger operations at EMA. It also supports the expansion of air freight operations, given the particular importance to the national and regional economies of EMA as a national centre for these operations. It forecast that by 2030, EMA could attract between 12 and 14 million passengers per annum and could be handling 2.5 million tonnes of freight a year.

4.2 Subsequent Developments

With the encouragement of Government, the Airport prepared its Master Plan in 2006 with a view to establishing how the broad strategy for EMA set out in the White Paper could be implemented. The primary focus of the Master Plan is the period up to 2016. By that date, the ATWP expected that the Airport could attract 9.22 million passengers per year, handle 1,207,000 tonnes of cargo, and experience 110,900 air transport passenger and cargo movements, 31% of these occurring at night. As previously stated the Master Plan revised and updated the EMA noise controls.

Since the publication of the ATWP the Department for Transport has undertaken a significant programme of work to ensure that the long-term strategy remains up-to-date, including the "Future of Air Transport Progress Report" in 2006; the consultation on "Adding Capacity at Heathrow Airport" and the updated UK Air Passenger Demand and CO2 Forecasts, in 2007 and 2009. The latter reduced the 2030 forecast for EMA from 14mppa to 11mppa, but no revision to freight or mail forecasts was made.

The increasing severity of the worldwide recession is affecting both passenger and freight throughput adversely. How long this continues remains to be seen, but under-performance of the UK industry, for at least into 2010, seems likely.

The key issue then will be how the industry recovers and whether there is a strong "bounce back" to or towards original forecasts or whether the underlying dynamic of the forecasts has changed.

A planning application to extend the runway was recently approved with conditions relating to noise by the Local Planning Authority. This is a relatively small proposal which will have no discernable net noise impact. It is considered in more detail in the full Report.

5 PUBLIC CONSULTATION

5.1 General Approach

The Airport has sought to undertake the consultation in an inclusive and highly professional manner along the lines set out in the Guidance and as reported to the Airport's Independent Consultative Committee (ICC).

In total, 155 organisations and individuals were formally consulted by the Airport including every member of the ICC. All received a letter from Penny Coates our Managing Director providing details of the consultation exercise and the 4 Outreach events to be held in local communities on the Draft NAP. The letter requested that comments be forwarded to the Airport by letter, fax or email.

Our approach ensured that we consulted a wide range of interests including local Town and Parish Councils; County, City and District Councils; national bodies such as the National Trust and National Air Traffic Services; regional bodies such as the East Midlands Development Agency and East Midland Regional Assembly; local amenity groups; Chambers of Commerce; airlines; on-site businesses; MPs and MEPs; as well as people living locally.

In addition, the EMA Strategic Development Forum (SDF) considered the subject on two occasions; the first before the start of the consultation process and the second at a specially convened meeting to discuss the Draft NAP. The SDF is an ad-hoc group formed in 1998 to provide feedback to the Airport on strategic issues. Membership includes representatives from the private and public sectors.

Given the local focus of this exercise as determined by the areas delineated by the noise maps, we were particularly keen to ensure that local communities had every opportunity to be aware of the Draft NAP and comment on it. As indicated above, we therefore arranged 4 Community Outreach events which took place on the dates and locations shown below:-

- Diseworth Heritage Centre, 14 July;
- Melbourne, Bill Shone Leisure Centre, 21 July;
- Castle Donington Village Hall, 25 August; and
- Kegworth Parish Council Rooms, 29 September.

Three of these events were located in North West Leicestershire with the Melbourne event being in South Derbyshire.

A press release was prepared drawing attention to the forthcoming exercise. This received good coverage in several daily and local newspapers and local radio. Posters were placed at key locations drawing attention to the Outreach Events. These were supplemented by adverts placed in several local publications. The NAP process was also highlighted in our community newsletter 'The Flyer', distributed to over 45,000 homes.

5.2 Overview

There was been a good response to the Draft NAP. We received 77 responses from a wide range of interests including County Councils, Parish Councils, amenity groups, the National

Trust, employers, local residents and MPs. In addition 65 people engaged with Airport staff at the 4 Outreach Events.

The main concern was night noise followed a long way behind by training flights. Many respondents consider that the existing noise controls were inadequate. Some considered that the Draft NAP should have put forward a wide range of new night noise initiatives, irrespective of what the mapping exercise shows or the fact that EMA's noise controls were reviewed and updated as recently as 2006.

A number of suggestions were made which were also made at the time of the consultation on the Master Plan. These comments were considered carefully at this time and whilst we have been careful to consider our position again, we generally concluded that the position that we previously reached was appropriate. Also some suggestions made do not fall within the remit of the Airport.

Finally, some respondents considered that the night noise levels should be reduced from current levels. These suggestions were invariably made without having regard to the national strategy set out in the ATWP and as firmed up in the Master Plan, documents which the Guidance requires the Airport to take account of in preparing the NAP.

5.3 Approach to the Analysis

We took a careful and considered approach to processing all the comment/suggestions. We sought to be inclusive by taking on board suggestions where it was possible to do so. Some points put to us related to joint working and future liaison, or were expressions of agreement. In general these did not require changes although points to be progressed outside the NAP process are now referred to in the full report. Others implicitly challenged the framework provided by the Guidance and/or the national strategy as set out in the ATWP. These have been noted but again they generally did not lead to changes in the Draft NAP.

5.4 Main Themes

In order to assist discussion the many detailed comments/suggestions contained in the responses to the consultation plus feedback from the Outreach Events were distilled into 25 themes or topics which are listed in the full report.

An indication is given of those aspects which the Airport accepted and incorporated into the NAP, those which we did not accept, and those which did not seem to have any implications for changing the NAP. The reasons supporting the Airport's approach is also indicated, as is the strength of response on the various issues including those raised at the Outreach Events.

Most comments were received on the Airport's 1996 night noise contour target and related issues. Other "high-scoring" topics were SIGS, the Strategic Noise Mapping exercise, the need for an independent body, freight payload, format and readability of the Draft NAP, the target that by 2012 all aircraft operating at night will comply with "Chapter 4", and the need for a long-term strategy. After these there were 10 topics which received several responses each, followed in turn by 4 topics which generated a few responses each.

As a result of the consultation exercise 26 changes were made to the Draft NAP mainly in the form of points of clarification, additional information requested by consultees and points to be progressed with future review and development of the NAP. These changes are listed in the NAP and in our report on Consultation and Responses. Our Submission Draft Report was much improved as a result of these changes. We have not however changed any of our existing noise controls or added any new ones as a result of the consultation process. The reasons for this are stated in greater detail in the full report.

6 ACCEPTABILITY OF NOISE IMPACT AT EMA

6.1 The Test

The Guidance sets out the crucial test which forms the basis on which the NAP has to consider in order to establish whether or not further action is required. It specifies that Airport Operators will primarily have two pieces of information available to them for action planning. These are:-

- the *current* noise impact of their operations as shown by the results of the noise mapping; and the *current* noise control measures they have in place.

The NAP process requires consideration to be given regarding the following:-

- is the *current* noise impact acceptable? If the answer is 'Yes' then it can be assumed that the current noise control measures are adequate. If the answer is 'No' then further action is required and this action will be proposed as part of the NAP under the terms of the Regulations.

6.2 **Conclusion**

Having taken account of all relevant factors, including the findings of the ATWP, subsequent developments, PPG 24, the Attitudes to Noise from Aviation Sources in England study (ANASE), the Guidance including the Strategic Noise Mapping exercise, the results of public consultation, and our Master Plan Monitoring and Implementation Report published in July 2009, we conclude that EMA has stringent noise controls in place, that these controls are responsive to forecast growth in traffic levels and remain fit for purpose.

EMA's noise controls were established as a result of an ongoing process of engagement and listening and the current controls were introduced after a comprehensive public consultation exercise followed by careful consideration of all responses. They are part of an evolutionary process and are being implemented successfully, monitored and fine-tuned to respond to changing circumstances. They seek to provide a balance between the benefits provided by the legitimate operation of aircraft at the Airport and the environmental impact which results. The Guidance endorses this approach noting that noise ...*"is an inevitable consequence of a mature and vibrant society. People enjoy and benefit from air transport and this benefit manifests itself in terms of business, leisure, the movement of goods and employment. When managing the environmental noise that arises from aircraft, a balance needs to be struck."*

We therefore conclude that the current noise impact at EMA is acceptable. This is the same conclusion we reached when we prepared the Consultation Draft NAP. As stated in that Plan, it is clear that the noise contours on the maps produced as a result of the strategic noise mapping exercise are the same shape as those which have been produced and published by the Airport for many years; they do not identify areas of noise exposure which have not already been considered in formulating the current noise amelioration programme.

Whilst the Airport does not currently propose to introduce amendments to the current noise mitigation programme as a result of the strategic noise mapping exercise and public consultation, we remain receptive to new ideas and fully accept the need to seek continuous improvement and to bear down on all aspects of aircraft noise. Many points and suggestions have been made to us during the public consultation exercise which, whilst not being directly related to the strategic noise mapping exercise as required by the NAP process, are nevertheless of great interest to the Airport and will be pursued. We will consider these carefully in our monitoring and review processes with a view to introducing them into our amelioration programme. We remain committed to maintaining ISO14001 accreditation with the independent monitoring that this involves.

We are pleased that the NAP process has validated the effectiveness of our noise control measures and note that the NAP will be subject to an ongoing and iterative process. It will be subject to regular review, which Government may require to be annual, which will provide

further opportunities to reconsider our noise mitigation measures as circumstances change and national aviation policy evolves.