

SW/LP

Mrs. S. Wylie

3281

2nd July, 2009

Ms. Cynthia Smith,
Chief Executive,
Planning Service Headquarters,
Millennium House,
17-25 Great Victoria Street
BELFAST
BT2 7BN

Dear Ms. Smith,

**Re: Planning Application George Best Belfast City Airport – Proposed Runway
Extension Environmental Health Comments**

At its meeting on 7th January 2009, the Health and Environmental Services Committee of Belfast City Council was informed that your Department had applied Article 31 of the Planning Northern Ireland to this application and that this designated the application of 'major importance'. They were also advised that this meant that prior to the application being determined, the Minister would either require a public inquiry to be held before the Planning Appeals Commission or issue the applicant with a notice of opinion advising on how the application should be dealt with.

After discussion the Health and Environmental Services Committee and the Town Planning Committee the Council agreed on 4th February 2009 to write to the Department of the Environment recommending that a Public Inquiry be held.

After further discussions within the Councils Committee system regarding the Environmental Statement, I can confirm that this is still the Council's position.

An outline of the Environmental Health response to the Environmental Statement submitted by the applicant in support of this application is detailed below. Obviously a Public Inquiry would examine the application and the Environmental Statement in much more detail and if this is to be the case, then the Council would wish to make a full submission to the Inquiry. However this letter provides a number of recommendations in respect of conditions which the Council is suggesting should be applied to planning permission, should the Minister decide against holding a Public Inquiry. These comments are therefore made without prejudice to the Council's request that the application should be determined by a Public Inquiry. This position was agreed by the Council on 1st July 2009.

A summary of the main issues arising from the Environmental Health assessment is as follows:

Evaluation of Air Noise Model Input Data

The Environmental Protection Unit did not receive all of the data it requested from the applicant in relation to aircraft mix, aircraft journey length and weight and so we are unable to comment comprehensively on the appropriateness of the modelling reported in the Environmental Statement and whether the airport has the potential to become noisier than forecast. The % fleet mixes used in respect of future scenarios modelled in the ES are essential to the assessment of future noise levels. The ES Addendum reports that the information relating to Point 3 above is commercially sensitive and does not supply it.

The noise contour report for 2008 published in respect of the airport demonstrated an increase in the 57dB contour area (representing the onset of high annoyance) from 3.81 sqkm in 2007 to 5.15sqkm in 2008, and the population within it from 3,522 to 7,819.

In that time, there was no significant change in overall number of Air Traffic Movements. The fleet mix did, however, change and this corresponded to a large increase in commercial jet movements in 2008.

The Environmental Statement also states 'no larger aircraft types' will be used in the future but it does point out that there is no restriction in the planning agreement on the mix of aircraft types and that the mix can and probably will vary over time based upon prevailing commercial decisions.

When forecasting noise it is usual to use a long term average runway modal split, ie assuming long term average weather in the future assessment. The chosen split used in the Environmental Statement looks inconsistent with the 2006, 2007 and 2008 average. No explanation for this is offered. The longer term splits could be more similar to the Environmental Statement, but if not, the Statement could have a significant error with regards noise in the residential areas in the vicinity of the airport.

Night Flights & the Effect of Noise on School Children

About 4 flights per day occur in the night (2300-0700 hours) period. Sleep disturbance is a concern to the local community, and is one of the biggest potential health impacts of a major airport. The ES makes no assessment of the potential for sleep disturbance from these flights and doesn't tell us what the effect of noise on the rate of learning of the school children attending schools situated within the noise contours will be.

The Env Health Department would like to see the Environmental Statement address both or be given assurances that both will be assessed in more detail in the Health Impact Assessment the airport has currently commissioned in respect of this application.

Indicative Noise Contour

In 2006 the Examination in Public (EIP) recommended a noise contour cap, using the term 'Indicative Contour', and aligned it on the $L_{Aeq\ 16\ hr}$ 57 dB contour for 2005 plus 15% of area (to allow about 1dB increase in noise). The new planning agreement for the airport commenced on 14th October of last year, however, the indicative contour for the airport has yet to be agreed between the Department of the Environment and the airport.

As stated earlier the noise contours around the airport have grown considerably from 2007-2008. It is important to note that if the Indicative Contour recommended by the EIP had been in place it would have already been exceeded.

This creates a further difficulty when attempting to assess the impact of this application, and whether the airport will become noisier than forecast. Agreement on The Indicative Noise Contour is needed to fully comment on the implications of the proposed runway extension.

Public Inquiry

The Minister is yet to decide how the application will be determined. It is this Council's opinion that a Public Inquiry is necessary to fully examine all the issues associated with this application and to consider the matters raised within this correspondence.

However, should a decision be taken not to proceed with a Public Inquiry, the Council is concerned that should the Minister deem to grant the application in doing so he will accept the Environmental Statement submitted by the applicant. The Council would be extremely disappointed if this was the decision taken. However in the event that this happens, the Council would like to see the following recommended conditions attached to any approval.

Recommended Conditions

1. Individual Aircraft Noise Restrictions

All air traffic movements by jet aircraft shall comply with the Chapter 4 certification limits, as laid down by the ICAO.

2. Noise Abatement Operating Procedures

The Airport operator shall install a permanent noise monitor within the community under the departure route from runway 22, shall set departure noise limits to be agreed with the local planning authority prior to commencement of operations on the extended runway, and shall enforce these in line with practice elsewhere in the UK so as to encourage the use of the quietest practicable aircraft operating procedures over the city.

3. Night Flight Restrictions

The annual number of night flights (ie those arriving or departing between 2300 and 0700 hours local time) shall not exceed the total in 2008 and comply with the existing planning agreement.

4. Reporting of Noise Exposure Information

At least annually, the airport operating company shall publish a Flight Evaluations Report releasing information from the Noise and Track Keeping System, including: flight numbers by day/night, by aircraft type, split into arrivals/departures by runway, by route, and infringements of departure noise limits, and forecast noise contours for the forthcoming summer. The contents of the report shall be presented to the airport consultative committee and its scope shall be agreed with the committee annually.

5. Indicative Control Contour

The Department of the Environment and the Airport shall agree an indicative control contour and a means of enforcing it. This control contour shall restrict the land area within the contour as much as possible, but which is no greater than the following:

the area over land of the actual average mode 57 dB $L_{Aeq\ 16\ hour}$ 92 day summer noise contour each year, shall not exceed the area over land of the long-term average mode 57 dB $L_{Aeq\ 16\ hour}$ 92 day summer noise contour for the high growth scenario D reported in the Environmental Statement, unless seasonal wind directions render this unachievable. The long-term average mode shall be the average runway modal split from 2003-2008.

Sound Insulation Scheme

The Council would also like it brought to the attention of the Planning Service that some airports within the United Kingdom applied a noise insulation scheme for those residences which fell within the 57 dB $L_{Aeq\ 16\ hour}$ contour and/or the 60 dB $L_{Aeq\ 16\ hour}$ contour.

Once again I would stress that these recommendations are without prejudice to the Council's request that the application be determined by a Public Inquiry, which is the Council's preferred position.

If you require any further clarification on any aspect of this correspondence do not hesitate to contact Mrs Suzanne Wylie, Head of Environmental Health on 90270304.

Yours sincerely,

Suzanne Wylie,
Head of Environmental Health