

Aberdeen Airport - Consultation Responses

Question	Comments	Our Response
Q1	<p>Out of seven responses overall, three respondents felt that the goal of being in the top fifth of airport companies for best practice was ‘sufficiently challenging’. Three other respondents answered that it was ‘not very challenging’ and one considered that it was ‘not at all challenging’.</p> <p>A Central Government respondent who saw the goal as ‘sufficiently challenging’ commented that in the light of technical and other constraints, this represented a reasonable target.</p> <p>However, a local resident/individual who considered the goal to be ‘not very challenging’ explained that the top 20% did not constitute a challenge considering all the international airports in the world and felt that the top 10% would provide a more challenging target. Another local respondent/individual (who also considered the goal ‘not very challenging’) stated that they felt the target was not especially well defined in terms of ‘best practice’.</p> <p>One respondent was particularly explicit in their reasons for considering the goal to be ‘not at all challenging’:</p> <p style="text-align: center;"><i>"The noise action relies on engineering benefits and aircraft operations to minimise noise. I cannot see you stopping engine running/testing at night time as it will lose revenue."</i></p>	<p>Goal</p> <p>At present there is no league table of airports with regard to noise management. However we have committed to doing some benchmarking to ascertain our present position and identify opportunities to enhance our noise management approach with comparable airports.</p> <p>There is expected to be around 30 airports of comparable size and scale of local population which could be compared against. Therefore a target of being in the top 20% would mean appearing 5th or 6th on the list. We believe that this is an appropriate goal, however when benchmarking has been carried out we may revise the goal as appropriate.</p> <p>BAA’s role</p> <p>In order to address the concern that the action plan relies on engineering benefits and aircraft operations only we will add a new action which is to aim to achieve aircraft of QC2 and below landing and taking off at Aberdeen Airport.</p> <p>Ground noise and engine running</p> <p>We will update the plan to explain more about current practices, including why aircraft have to face nose into the wind to carry out engine running. Engine running is an essential part of airport operations. Engines need to be tested for safety reasons and are</p>

	<p>Local resident/individual (answering ‘not at all challenging’)</p> <p>However, they did consider that “<i>active measures such as earth banks around taxiways could reduce the noise of taxiing aircraft</i>” whilst “<i>noise diffusers could prevent [or] could help reduce noise of aircraft at the start of the take off.</i>”</p>	<p>part of the maintenance of aircraft. We understand that this noise can cause disturbance to local residents and therefore adopt certain measures to reduce the impact on the community. We do not allow engine testing during the night unless explicitly requested for health and safety reasons. During the day we send helicopters to a less sensitive area when they are carrying out engine running. We will add into the plan a new action on engine testing. This action will be to report on the frequency and times of engine running to the airport consultative committee. We hope by reporting on engine running we will assure residents that we are managing engine running as responsibly as possible.</p> <p>Noise Bunds</p> <p>Currently noise bunds would offer little protection from the noise of helicopters to the local residents. This is because, unlike fixed wing aircraft, helicopter noise does not travel in one direction, therefore the noise would travel over and around any noise bund. We will continue to monitor new technologies in the development of noise bunds to find a suitable solution.</p>
Q2	<p>Of the seven responses received, four felt that the noise strategies outlined in the Noise Action Plan targeted the most important problems in relation to airport noise (one ‘completely’ and three ‘partially’), while three respondents felt it did not (one ‘not very’ and two ‘not at all’).</p> <p>There was some feeling evident that the Noise Action Plan was not explicit enough in terms of what noise strategies were being proposed. Whilst one respondent considered the strategies to be “rather vague”, another commented that:</p>	<p>It is important to point out that the airport already voluntarily adopts a lot of processes to reduce noise and aims to adopt best practice whenever possible, such as restricting engine running at night. We are challenged to responsibly manage the impact of noise on local residents while maintaining a safe and efficient operation of the airport and we will implement the actions in the plan. A key element in the plan which we have committed to, is to consult with the local residents on a noise mitigation scheme. The noise footprint maps produced by CAA demonstrate that noise is in decline around the airport despite increase in movements. In order to assure the local community that we aim</p>

	<p><i>"You have taken the easiest way out, your report is a big snow storm of useless information made to fit your goals and aspirations of growth for the airport. You have not once said what you will do to reduce the noise only that you accept the airport makes noise"</i></p> <p style="text-align: right;">Local</p> <p>resident/individual (answering 'not at all')</p> <p>Another respondent who also considered that the plan did not target the most important problems at all gave their reason as:</p> <p><i>"BAA is not involved in reducing or prevention of noise only in minimising noise by operational procedures."</i></p> <p style="text-align: right;">Local</p> <p>resident/individual (answering 'not at all')</p> <p>There was also mention of the circumstances which are unique to Aberdeen Airport, specifically the levels of helicopter flights from the airport:</p> <p><i>"It [the Noise Action Plan] seems to be largely based on a generic BAA template that completely fails to recognise the noise problems that are unique to Aberdeen. While fixed wing aircraft are undoubtedly getting quieter and the 57 db LAeq footprint is getting smaller, the issue of ground running helicopters and helicopter testing/training</i></p>	<p>to continue this reduction in noise we will add a new target into the plan which will be to aim to maintain or decrease the square meter area which falls within the 57db leaq contour line as determined by the CAA.</p> <p>BAA not reducing or preventing noise Although the role at a local level at Aberdeen airport can only be about adopting operational procedures to minimise noise, at a corporate level BAA carries out a range of actions to influence aircraft manufactures and airlines. Please see section 10 of the action plan.</p> <p>Ground noise and helicopter training Under the Environment Noise Directive the noise maps and associated plans only have to consider noise from aircraft landing and taking off. However we have included ground noise in this plan because we understand how much of a concern it is to the local community.</p> <p>Although mandatory training and testing are an important part of helicopter operations to maintain the high safety standards required, certain helicopter operators have protocols enforced on them to reduce ground noise impact.</p> <p>We will add a new action into the plan to monitor ground noise annually and share the results with Aberdeen City Council.</p>
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	<p><i>exercises is barely mentioned."</i></p> <p>Local Government respondent (answering 'not very')</p> <p>A second local government respondent displayed similar concerns that whilst the plan does indeed target the most important problems, it needs to be more explicit in terms of what actions are to be taken to keep disturbances from the ground movement of helicopters to a minimum (particularly in the Cordyce View area of Aberdeen).</p>	
Q3	<p>Three of the seven respondents to the consultation considered the Noise Action Plan to provide a suitable framework to manage aircraft noise (two 'completely' and one 'partially') while four respondents thought it did not provide a suitable framework (two 'not very' and two 'not at all').</p> <p>One local government respondent felt that the noise action plan provided a 'completely' suitable framework, but added:</p> <p><i>"It is important implementation is monitored and the plan regularly reviewed and updated to take account of performance, the local environment and aircraft activity."</i></p> <p>Local Government</p>	<p>Reporting Progress</p> <p>As discussed in section 8 of the plan, the progress against the actions will be published at the consultative committee and annual Corporate Responsibility report.</p> <p>Expansion and Monitoring</p> <p>The noise footprint maps produced by CAA demonstrate that noise is in decline around the airport despite increase in movements. In order to assure the local community that we aim to continue this reduction in noise we will add a new target into the plan which will be to aim to maintain or decrease the square meter area which falls within the 57db leaq contour line as determined by the CAA.</p> <p>It is not the intention of this plan to question government policy in regard to the frequency that noise mapping takes place around</p>

<p>respondent (answering ‘completely’) Another respondent commented that:</p> <p><i>"The noise action plan states some methods of how noise can be reduced but there is no active method of monitoring the effectiveness of the plan except by complaints. People get fed up of complaining especially when it is not effective.</i></p> <p><i>Noise reduction from aircraft will not be so effective in the future and the expansion of the airport will allow bigger and noisier planes to land. Permanent noise monitors are required and action when they show an increase. Monitoring every 5 years is not effective."</i></p> <p style="text-align: center;">Local resident/individual, (answering ‘not very’)</p> <p>Once again, comments made mention of the fact that whilst there were strategies in place to manage noise from fixed-wing aircraft, helicopter movements were not explicitly mentioned by the plan:</p> <p><i>"Aberdeen's policies regarding fixed-wing aircraft represent sound practice and the noise action plan indicates that improvements are possible.</i></p> <p><i>However, there are apparently no policies and no plans to mitigate helicopter noise. As we presumably agree, the east-side operator could ground-run any number of helicopters</i></p>	<p>the airport.</p> <p>Helicopter Noise Under the Environment Noise Directive the noise maps and associated plans only have to consider noise from aircraft landing and taking off. However we have included ground noise in this plan because we understand how much of a concern it is to the local community. Although mandatory training and testing are important part of helicopter operations to maintain the high safety standards required, certain helicopter operators have protocols enforced on them to reduce ground noise impact. We will add a new action into the plan to monitor ground noise annually and share the results with Aberdeen City Council.</p> <p>Banning Aircraft We continue to work to the international standards with regard to banning aircraft. However we will add a new action which is to aim to achieve aircraft of QC2 and below landing and taking off at Aberdeen Airport.</p>
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	<p><i>from 6am until 10:30pm every day without breaking any rules. This may not affect the 57 db contour, but it has a devastating effect on 100s of properties in Dyce."</i></p> <p>Local government respondent (answering 'not very')</p> <p>Another respondent who felt the Noise Action Plan did not provide a suitable framework to manage aircraft noise at all commented that:</p> <p><i>"The plan seems to have no teeth. I don't see mention of banning noisy aircraft types or carriers."</i></p> <p>Local resident/individual (answering 'not at all')</p>	
Q4	<p>Three of the seven respondents considered that the performance indicators proposed by the Noise Action Plan were 'fairly sufficient' to measure progress in implementing the action plan. Two considered that they were 'not very sufficient' and two that they were 'not at all sufficient'.</p> <p>One local government respondent who considered the performance indicators 'fairly sufficient' also added their suggestion of a useful performance indicator:</p> <p><i>"While appreciating noise from airborne aircraft and the noise contours are largely outwith BAA control, a useful performance indicator may be a numerical target to reduce the population or number of households</i></p>	<p>Target to reduce population within specific bands We will adopt a new target to aim to maintain or decrease the square meter area which falls within the 57db leaq contour line as determined by the CAA.</p> <p>Night, evening and day noise It is not in the scope of this plan to question the government's policy on how to measure aircraft noise. However it is important to point out that the db Lden noise maps include an arbitrary weighting of 5 dB applied to each of the evening (19:00–23:00) movements and 10 dB for each of the night (23:00–07:00) movements, to take into account the greater disturbance at night.</p> <p>Complaints</p>

<p><i>within specific bands."</i></p> <p>Local Government respondent (answering 'fairly sufficient')</p> <p>In contrast, one respondent who considered the performance indicators to be 'not at all' sufficient gave the following explanation:</p> <p><i>"Key performance indicators do not take into account the extent of the full extent of the noise floor or the frequency of noise only the average noise. I believe that noise in the evening and noise during the day when people would like to use [their] gardens can be the most annoying. Averaging noise / peak noise and when noise occurs should be noted (Noise must be measured not estimated)."</i></p> <p>Local resident/individual (answering 'not at all sufficient')</p> <p>A local resident/individual who answered that the performance indicators were 'not very sufficient' considered that this was because there was "<i>no commitment as to what will be done if there are a large number of complaints.</i>"</p> <p>An insufficient emphasis towards the noise from helicopter operations was once again cited as an area of concern, particularly noise generated from ground running (mentioned by a local government respondent who felt the performance indicators were 'not very sufficient') and test</p>	<p>All complaints received are investigated. We will change the plan to include a commitment that if a spike of exceptionally high number or unusual complaints are received the airport would immediately investigate the cause. We will also add noise enquiries and enquirers as a performance indicator in the plan which we will report Aberdeen City Council.</p> <p>Ground noise and helicopter training</p> <p>Under the Environment Noise Directive the noise maps and associated plans only have to consider noise from aircraft landing and taking off. However we have included ground noise in this plan because we understand how much of a concern it is to the local community.</p> <p>Although mandatory training and testing are important part of helicopter operations to maintain the high safety standards required, certain helicopter operators have protocols enforced on them to reduce ground noise impact.</p> <p>We will add a new action into the plan to monitor ground noise annually and share the results with Aberdeen City Council.</p> <p>Kingswells area</p> <p>We will add some further explanation into the NAP. Helicopter operators carry out training circuits in the area, often during off-peak times. During their training, helicopter pilots fly circuits and due to their relative slow flying speed - when compared to fixed wing aircraft - they must hold in close proximity to the airfield to allow them to quickly join the flow of aircraft when a window has been created by Air Traffic Control. Often this results in the pilots holding position around the Kingswells area, and this is unavoidable.</p>
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	<p>flights in the Kingswells area (mentioned by a local resident/individual who felt the indicators were ‘not at all sufficient’). The same respondent also added that:</p> <p style="text-align: center;"><i>"You keep talking about involving communities and giving dates [in] 2010, what about now?"</i></p> <p style="text-align: right;">Local resident/individual (answering ‘not at all sufficient’)</p>	<p>Dates in 2010 This is a 5 year action plan which includes actions up to 2013. Some actions will be delivered at the start of the plan, others towards the end.</p>
Q5	<p>One local resident/individual explicitly mentioned that it is a good idea to have an action plan, although considered that its effectiveness would be dependent on how easily the airport could be held to account. Another (central government) respondent felt the plan offered a “<i>reasonable balance between addressing the needs of business and leisure travel against environmental concerns</i>”. However, another felt that the plan lacked any real targets and therefore did not inspire them with confidence:</p> <p style="text-align: center;"><i>"Not a document which shows a caring company but a document that shows a company interested in making money without really actually placing any real targets to meet. I would like to see real targets for reducing the average and peak levels of noise with the noise being monitored daily and the</i></p>	<p>Effectiveness of plan We believe that the actions in the plan are appropriate considering the challenge of operating a safe, successful and realistic operation of the airport We will continue to develop the plan in future years and build on the actions within it. It is vital that the plan is flexible to allow us to stretch our targets if we over perform against the target. Aviation is a fast developing industry which can experience many changes which may or may not impact on actions in the plan.</p> <p>Language and Layout Noise is a complicated issue with many acronyms and technical terms. We will review the action plan to ensure it is clear and simple to understand as possible. The Scottish Government dictate some elements of what is included in the plan.</p>

¹ Page 6 of the Aberdeen Airport Noise Action Plan

² Section 3 Purpose and Scope (page 5) of the Aberdeen Airport Noise Action Plan

	<p><i>results available on the net. The opt out phrase that the company reserve the right to change the parameters does not inspire confidence."</i></p> <p>Local resident/individual</p> <p>Some respondents felt that the language or layout could be simplified and some terms would benefit from explanation. For example, it was felt by one local government respondent that the term "sustainable aviation" and references to "noise mitigation schemes like Heathrow and Gatwick" (both in section 10 of the plan) needed defining. Another local resident/individual considered the plan should "<i>use plain English and simple bulletin points, stop hiding behind bumph</i>".</p> <p>Once again, helicopter movements were also mentioned in the context of the Aberdeen Noise Action Plan. One local government respondent expressed a number of concerns, particularly with respect to the third of five key themes for BAA's noise action work contained within the noise action plan, that of "Influencing planning policy to minimise the number of noise sensitive properties around our airports."¹</p> <p><i>"Does this mean that the airport will use its considerable influence with Aberdeen City Council to block residential developments or dictate planning policy in other ways? Does this mean that the east-side is earmarked for further helicopter activities? What does this mean for the future of the properties on</i></p>	<p>Influencing Planning Policy When approached by the planning authority we will continue to provide details as to areas subject to noise from the airport. The final decision lies with the planning authority whether to grant planning permission in an area experiencing aircraft noise. We would welcome working with the local authority to prevent new housing being built in areas of noise.</p> <p>24 hour operation The airport has publicly and categorically stated that it doesn't support, and it is not a requirement for 24hr helicopter operations, and we do not foresee any changes to current hours of operation. However any helicopter carrying out humanitarian flights must be permitted to land.</p> <p>Aircraft and Helicopters We will change the action plan to make it explicit that aircraft refers to both fixed wing and rotary aircraft. The directive only considers airborne noise in this round of mapping.</p> <p>All areas of the airport re considered in the plan.</p> <p>Contours on website Contours will be attached as part of the publication of this noise action plan which will be on the web. Noise survey results sent to council who will make available on request.</p> <p>Helicopter Research The relatively unique situation Aberdeen finds itself in with</p>
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	<p><i>Cordyce View?</i></p> <p><i>Our grave concerns re the possibility of 24-hour helicopter operations remain.</i></p> <p><i>Although airport management have given us off-the-record assurances (which we accept) that night-time helicopter operations will not be permitted, we remain very concerned that BAA refuses to publicly commit to this. Why is this?"</i></p> <p>Government respondent</p> <p>A local government respondent offered the following observations on the plan:</p> <p><i>"It is assumed 'aircraft' includes planes and helicopters. This should be made clear and that the noise contours refer only to airborne aircraft</i></p> <p><i>Section 3 re aircraft taxiing and engine running on the airfield. Does this include the east side of the airport during passenger loading to helicopters and helicopters awaiting air traffic control clearance?²</i></p> <p><i>Recommend the noise contours and noise survey information are put on the Airport/BAA website.</i></p> <p><i>As aircraft noise in Aberdeen is uniquely influenced by helicopters it would perhaps be beneficial if BAA considered further research</i></p>	<p>reference to the impact helicopter operations have on noise has been the subject of a number of studies and research by BAA. Discussions have also been held with experts from the local universities, with a view to better understanding how helicopter noise can mitigated, reduced or "treated". Helicopter noise provides a different challenge from fixed-wing aircraft as the direction the noise travels is quite different - meaning traditional means of reducing noise do not have the same effect. In-depth modelling has also been carried out, with consideration given to building walls, deflectors and additional hangers to provide a physical barrier against helicopter noise. Our investigations are continuing with this in mind.</p>
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	<p><i>into the noise profile/contours resulting from helicopter movements or if some weighting was included within the existing contours to account for helicopter movements"</i></p> <p>Local</p> <p>Government respondent</p>	
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