

## Glasgow Airport - Consultation Responses

Question	Comments	Our Response
Q1	<p>Of the nine responses received to the Glasgow Airport consultation, two respondents felt that BAA's long-term goal was 'too challenging', two that it was 'not very challenging' and another two that it was 'not at all challenging' (two responded 'don't know' and one gave no answer).</p> <p>Comments were received at this question by two respondents who felt that this represented the wrong goal and that the goal should instead be related directly to the impact on local communities (such as whether local communities are satisfied with the airport-related noise) rather than comparing against other airports.</p> <p><i>"It's the wrong goal! The goal should be related to the impact of noise on communities living near to the airport, not whether you're doing best practice. Best practice is just a means to an end - it is irrelevant as a goal.</i></p> <p><i>The real indicator is whether local communities are satisfied with the impact of airport-related noise on their lives. You should set a target related to that, not best practice."</i></p> <p style="text-align: right;">Local resident/individual (answering 'not very challenging')</p> <p><i>"That's an irrelevant goal - the performance indicator should be impact on local people, not comparing yourselves with other airports!"</i></p>	<p><b>Goal</b></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>In general the responses are concerned that the goal doesn't address the impact on local communities. To address this concern a new action has been added to Section 10 of the plan. This action is that we will aim to maintain or decrease the square meter area which falls within the 57db leaq contour line as determined by the CAA.</p>

	<p style="text-align: center;">Representative Organisation (answering ‘not at all challenging’)</p>	
<p>Q2</p>	<p>Four of the nine respondents considered that the noise strategies outlined in the plan were ‘partially’ targeting the most important problems in relation to aircraft noise, while another four thought they were not (one ‘not very’ and three ‘not at all’). In addition, one local government respondent did not answer the question but commented that they “<i>considered that the Action Plan has taken account of the main sources of noise complaint from aircraft.</i>”</p> <p>Three local residents/individuals both felt the strategies ‘partially’ targeted the most important problems, but also made the following observations:</p> <p style="padding-left: 40px;"><i>"1. Levels of fines and landing fee differential should be reviewed every year, not every 3 years.</i></p> <p style="padding-left: 40px;"><i>2. Ground running - there should be a ban on ground running of engines at night, not simply 'operators are expected not to do it'."</i></p> <p style="text-align: right; padding-right: 40px;">Local resident/individual</p> <p>(answering ‘partially’)</p> <p style="padding-left: 40px;"><i>"1. I did not see any reference to redesigning the departure routes. Some routes could be taken AWAY from populated areas with little impact on operational issues. This will provide safety benefits as well as noise benefits.</i></p> <p style="padding-left: 40px;"><i>2. I did not see any reference to limiting the number of</i></p>	<p><b>Levels of fines and landing fees</b> We have accepted the suggestion of reviewing the fines and landing fee every year instead of every three years. This will be changed in all three Scottish Airport Action Plans.</p> <p><b>Ground noise and engine running</b> We will update the plan to explain more about current practices. Engine running is an essential part of airport operations. Engines need to be tested for safety reasons and are part of the maintenance of aircraft. We understand that this noise can cause disturbance to local residents and therefore do not allow engine testing during sensitive times such as the night. We will add into the plan a new action on engine testing to report on the frequency and times of engine running to the local community and the airport consultative committee. We hope by reporting on engine testing we will assure residents that we are managing engine testing as responsibly as possible.</p> <p><b>Aircraft Routes</b> It is a matter for National Air Traffic Services (NATS) to make any amendment to standard arrival routes or standard departure routes at Glasgow Airport, changes that would have to put out for full public consultation. Such a consultation would be run by the Civil Aviation Authority Directorate of Airspace Policy, could last for two years because of the likely implications and may even require a full public inquiry.</p>

	<p><i>night movements"</i></p> <p>(answering 'partially')</p> <p>Local resident/individual</p> <p><i>"No account is taken of noise from landing aircraft with respect to fines for excessive noise. There is no information on current percentages of continuous descent approaches (CDA) or future targets and timescales."</i></p> <p>Local Government respondent</p> <p>(answering 'partially')</p> <p>Another local resident/individual felt the strategies were failing to target the most important areas and commented that:</p> <p><i>"Glasgow airport is a business and it doesn't care about the poor, unfortunate people trying to get a night's sleep with at least 87 decibels flying over their roof every 5 minutes. They make money from the airlines and passengers not from the local people whose lives are so badly affected by the noise of the planes flying overhead. It is in their interest to increase the number of planes using the airport, however noisy they are."</i></p> <p>Local resident/individual</p> <p>(answering 'not at all')</p> <p>For another respondent, the geographic focus of the noise strategies was inappropriate:</p> <p><i>"How BAA have decided to prioritise Yoker Bearsden Johnstone and ignore Whitecrook is questionable. The monitoring of departing aircraft noise performance 6.5 miles from the airstrip, while ignoring arriving aircraft</i></p>	<p>Safeguarding issues in relation to departure and approach paths would have to be carefully considered to ensure there were no obstacles of sufficient height that would cause concern.</p> <p><b>Night Flights</b></p> <p>Glasgow Airport has always operated on a 24 hour basis, though the number of night time flights is relatively low. In 2007, around 4,000 flights – out of an annual total of 93,000 flights – operated between the hours of 23.00 and 06.00hrs. Over the course of a year, this equates to around 5% of all flight movements.</p> <p>A certain number of these night flights are necessary in order to correspond with schedules and time differences around the world. Also, a number of Glasgow's night flights are Air Ambulance flights to and from the Highlands and Islands</p> <p>However, we are mindful of the inconvenience this can sometimes cause local residents, and Glasgow Airport therefore voluntarily adopts Department for Transport night-time noise restrictions, which limit noise levels between the hours of 23.00 and 06.00. Glasgow Airport has no obligation to impose night time limits, but does so on an entirely voluntary basis.</p> <p>BAA Glasgow will continue to monitor the number of night time flight movements but does not foresee an increase in the number of such movements.</p> <p><b>Noise Fines for Landing aircraft</b></p> <p>During the period 1994-99 the Government considered the feasibility of setting noise limits for arriving aircraft through</p>
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	<p><i>which thunder over Whitecrook at 94d and above (data from noise monitoring equipment situated at John Knox Street Whitecrook will be sent hard copy). The numbers of arriving night flights which thunder over Whitecrook in excess of 87dB is absolutely unacceptable. The present system of drawing contour lines on maps for Leq 16 hour is an outdated nonsense which is used to prevent compensation for real time noise events of 94dB and over(day) and 87dB and over (NIGHT)."</i></p> <p style="text-align: right;">Local resident/individual</p> <p>(answering 'not at all')</p>	<p>the then Department for Transport, Local Government and the Regions' (now DfT) Aircraft Noise Monitoring Advisory Committee (ANMAC). The ANMAC concluded that there were too many variables affecting noise from aircraft when landing to implement a fair system of fining. The then Aviation Minister decided against imposing operational noise limits for arriving aircraft but a Code of Practice should be established to address this issue. The report produced is available on the Dft website and is titled 'Noise from Arriving Aircraft: Final Report of the ANMAC Technical Working Group' 1999 as is the Arrivals Code of Practice.</p> <p><b>Continuous Descent Approaches</b>  Currently the airport doesn't have the capability in its systems to measure continuous decent approaches. A whole package of work is needed to deliver continuous decent approaches in an acceptable robust way. This work begins with liaison with NATS who control the airspace and thus are key to instigating continuous decent approaches. We have an action in the plan to support continuous decent approaches and measure them when we are able to.</p> <p><b>Airport as a business</b>  Glasgow Airport has been an integral part of the social and economic life of Glasgow and the west of Scotland for over 40 years. As a business, it contributes significantly to the regional economy, supporting more than 5,000 jobs and underpinning the area's tourist industry which, in 2007, contributed more than £700 million a year to the economy. Nevertheless, the airport does take its responsibility to local</p>
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		<p>residents seriously, and has taken steps to address night-time noise issues, specifically by adopting Department for Transport night time noise limits. Glasgow Airport is not obliged to impose such restrictions and does so on an entirely voluntary basis because we are a responsible company. The number of night time movements is relatively slight, with around 5% of all flights operating between the hours of 23.00 and 06.00 hrs. However, we are committed to taking further action to minimise the impact of night time noise.</p> <p><b>Geographic Focus</b></p> <p>Part of the work undertaken by the Scottish Government in order to create the noise maps which inform the noise action plans, was to create a source prioritisation matrix combining noise from road, rail and aircraft to determine areas most affected by these noises combined. This is why certain areas were mentioned as opposed to others. In reality, and as stated in the plan any measures taken to reduce aircraft noise will impact the total area within the noise contours, benefiting a wider audience than any targeted priorities. Therefore Glasgow Airport will adopt a generic approach in aiming to reduce aircraft noise.</p> <p>Because this has caused confusion to the responses it has been decided that all references to the Scottish Government Source Prioritisation matrix should be removed.</p> <p>It is not the intention of the plan to question the methods used for measuring noise laid out by the government in the white paper on aviation.</p>
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<p>Q3</p>	<p>Three respondents felt that the noise action plan provided a ‘partially’ suitable framework to manage aircraft noise, whilst four respondents considered the framework ‘not at all’ suitable (one answered ‘don’t know’).</p> <p>In addition, one local government respondent did not answer this question, but commented instead that “<i>the framework is suitable for the purpose</i>”.</p> <p>Three respondents offered further suggestions as to how aircraft noise should be managed:</p> <p style="padding-left: 40px;"><i>"Fines on aircraft which are too noisy should be reviewed annually. This appears to be effective and an annual escalator would put pressure on airlines to lease quieter aircraft."</i></p> <p style="text-align: right; padding-right: 40px;">Representative Organisation (answering ‘partially’ suitable)</p> <p style="padding-left: 40px;"><i>"They need to have a night-time curfew when NO planes fly (11.30-6.30)"</i></p> <p style="text-align: right; padding-right: 40px;">Local resident/individual (answering ‘not at all’ suitable)</p> <p style="padding-left: 40px;"><i>"... real time noise events where the actual noise event irritation and physical damage is caused to human beings should be the benchmark for compensation. No other industry could operate at this level as it would be closed down under present legislation."</i></p> <p style="text-align: right; padding-right: 40px;">Local resident/individual (answering ‘not at all’ suitable)</p>	<p><b>Levels of fines and landing fees</b></p> <p>We have accepted the suggestion of reviewing the fines and landing fee every year instead of every three years. This will be changed in all three Scottish Airport Action Plans.</p> <p><b>Night Flights</b></p> <p>Glasgow Airport has always operated on a 24 hour basis, though the number of night time flights is relatively low. In 2007, around 4,000 flights – out of an annual total of 93,000 flights – operated between the hours of 23.00 and 06.00hrs. Over the course of a year, this equates to around 5% of all flight movements.</p> <p>A certain number of these night flights are necessary in order to correspond with schedules and time differences around the world. Also, a number of Glasgow’s night flights are Air Ambulance flights to and from the Highlands and Islands</p> <p>However, we are mindful of the inconvenience this can sometimes cause local residents, and Glasgow Airport therefore voluntarily adopts Department for Transport night-time noise restrictions, which limit noise levels between the hours of 23.00 and 06.00. Glasgow Airport has no obligation to impose night time limits, but does so on an entirely voluntary basis.</p> <p>BAA Glasgow will continue to monitor the number of night time flight movements but does not foresee an increase in the number of such movements.</p> <p><b>Noise Measurement and Compensation</b></p> <p>It is not the purpose of this plan to challenge government</p>
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		policy on aircraft noise. Noise management at the airport is consistent with international standards.
Q4	<p>Of the nine responses, one respondent considered the performance indicators to be ‘fairly sufficient’, another one that they were ‘not very sufficient’ and four that they were ‘not at all sufficient’ (one responded ‘don’t know’).</p> <p>In addition, one local government respondent (who did not answer this question) did “<i>agree that a suitable and sufficient number of performance indicators are provided to allow progress of the plan be monitored</i>”.</p> <p>Further comments were received at this question as follows:</p> <p style="padding-left: 40px;"><i>"Benchmarking with other comparable airports does not promote improvement if other airports choose to do nothing. CDA - no target for percentage CDA achievement indicated or set in any timescale."</i></p> <p style="text-align: right; padding-right: 40px;">Local resident/individual (answering ‘fairly sufficient’)</p> <p style="padding-left: 40px;"><i>"Because there is no real measurement as there is not a proper monitoring system in place. The 16 hour Leq system presently used to draw the contours is used by UK Government this calculation was originally connected to the idea that if you were exposed for this length it would affect hearing."</i></p> <p style="text-align: right; padding-right: 40px;">Local resident/individual (answering not at all sufficient’)</p>	<p><b>Benchmarking with comparable airports</b> We agree that benchmarking with other airports does not reflect the specific local concerns of our community. This is why we will add a new action in the plan to aim to maintain or decrease the square meter area which falls within the 57db leaq contour line as determined by the CAA. By adopting this action we can reduce the local community affected by noise.</p> <p><b>Continuous Descent Approaches</b> Currently the airport doesn’t have the capability in its systems to measure continuous decent approaches. A whole package of work is needed to deliver continuous decent approaches in an acceptable robust way. This work begins with liaison with NATS who control the airspace and thus are key to instigating continuous decent approaches. We have an action in the plan to support continuous decent approaches and measure them when we are able to.</p> <p><b>Noise Measurement</b> It is not the role of this plan to challenge government policy on noise measurement. The measure we use is what is set out in the government white paper on aviation. The white paper went through a lengthy public consultation to determine the most appropriate measure for noise.</p> <p><b>Performance Indicators</b> Glasgow Airport exceeds its statutory obligations in terms of noise mitigation, and also complies with internationally</p>

	<p><i>"Glasgow airport have shown very little concern for the local population up till now, so I doubt very much they will TRULY measure up to any performance indicators that are INDEPENDENTLY (by local council) assessed."</i></p> <p>Local resident/individual (answering 'not at all sufficient')</p>	<p>agreed standards on noise monitoring. We are happy to share our practices and processes with key stakeholders.</p>
<p>Q5</p>	<p>A number of additional comments were made by respondents to the consultation. One felt that the noise complaints freephone number should be better publicised:</p> <p><i>"I had no idea that there is a freephone number for complaints about aircraft noise, and I'm the Secretary of a local Community Council which is on your consultation list. Perhaps you should advertise that number a little more widely!"</i></p> <p>Local resident/individual</p> <p>Concerns about the seriousness of aircraft noise disturbance were reiterated by one respondent:</p> <p><i>"I and many of the people who have attended meetings and have complained on a regular basis to BAA Glasgow fully understand the benefits for the economy employment and easy travel and do not want to stop planes flying. What I and most of the people are saying is that the increasing number of flights at 94dB/DAY and 87dB quite seriously affects the quality of life of residents living under this flight path. There is evidence from The World Health Organisation that a single night noise event of 47dB can cause sleep disruption and possible</i></p>	<p><b>Communication</b> It is the intention of the airport to launch a community newsletter where the phone number will be published. This should ensure all are aware of the number to phone with queries or complaints regarding noise.</p> <p><b>General Noise Concerns</b> The aim of this plan is to begin to address these concerns while maintaining the economic and social benefits of air travel.</p> <p><b>Geographic Focus</b> Part of the work undertaken by the Scottish Government in order to create the noise maps which inform the noise action plans, was to create a source prioritisation matrix combining noise from road, rail and aircraft to determine areas most affected by these noises combined. This is why certain areas were mentioned as opposed to others. In reality, and as stated in the plan, any measures taken to reduce aircraft noise will impact the total area within the noise contours, benefiting a wider audience than any targeted priorities. Therefore Glasgow Airport will adopt a generic approach in aiming to</p>

	<p><i>cardiovascular and other health problems. ANASE state that aircraft noise annoyance is higher than it was in 1982 and this does not square absolutely with BAA stating that the noise footprint is less nowadays. BAA admit in the noise document that noise is a problem for people living under flight paths and living near to airports so that is a fact."</i></p> <p style="text-align: right;">Local</p> <p>resident/individual</p> <p>A local government respondent queried the areas identified as priorities by the plan and the incidence of noise breaches:</p> <p><i>"You identify (on page 12) Yoker, Bearsden, Linnwood and Gilmartin Road area as high priorities without explanation. Yoker is not directly under the flight path, yet Clydebank is and is not mentioned. In the final document this should be clarified.</i></p> <p><i>You state 3 noise breaches in 2007, but information provided by BAA Glasgow to us indicates there were 8 breaches in that period."</i></p> <p style="text-align: right;">Local government</p> <p>respondent</p> <p>Another considered that making the airport itself more responsible for noise breaches would mean that public concerns would be better recognised:</p> <p><i>"I would like to see independent noise pollution monitoring set up along the flight path (particularly for planes landing as it is noisier). I think that the airport/BAA should be heavily fined when they breach noise limits. At</i></p>	<p>reduce aircraft noise. Because this has caused confusion to the responses it has been decided that all references to the Scottish Government Source Prioritisation matrix should be removed.</p> <p><b>Noise Limit Breaches</b></p> <p>There have been 8 events, in 2007, where noise has been recorded by the noise monitors which exceeded our noise limits. However only 3 could be attributed to aircraft.</p> <p><b>Independent Noise Monitoring</b></p> <p>Glasgow Airport exceeds its statutory obligations in terms of noise mitigation, and also complies with internationally agreed standards on noise monitoring. We are happy to share our practices and processes with key stakeholders. As outlined previously, BAA Glasgow has a comprehensive package of measures in place to mitigate against aircraft noise. These include fines against airlines that breach agreed noise thresholds. It is, in our view, entirely appropriate that airlines should be ultimately responsible for reducing aircraft noise; after all, BAA does not operate any aircraft.</p> <p><b>Aircraft Routes</b></p> <p>It is a matter for National Air Traffic Services (NATS) to make any amendment to standard arrival routes or standard departure routes at Edinburgh Airport, changes that would have to put out for full public consultation. Such a consultation would be run by the Civil Aviation Authority Directorate of Airspace Policy, could last for two years because of the likely implications and may even require a full</p>
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	<p><i>present it is just the airline. I feel that if BAA was heavily fined then they would take complaints much more seriously."</i></p> <p style="text-align: center;">Local</p> <p>resident/individual</p> <p>One respondent argued that altering the departure routes used would improve both noise and safety issues:</p> <p><i>"The departure tracks for jets on runway 05 unnecessarily expose populated areas to both noise and the risks associated with aircraft overhead. Take for example the NGY3J departure. Most modern aircraft will use FMGC generated tracks (either RNAV or GPS derived) and will maintain them with tight accuracy.</i></p> <p><i>(a) If the initial departure track was aligned about 5 degrees more easterly, it would take the aircraft up a "wedge" between 2 built up areas. As outlined above, modern aircraft can track this fairly accurately.</i></p> <p><i>(b) It demands a turn that takes the aircraft right overhead a major built up area at around 5 DME (Milngavie). This takes the aircraft directly OVER the built up area. If the turn was delayed until (say) 6 DME the aircraft would turn outside the built up area. The presence of the Campsies is not an issue as there is a minimum altitude of 2000ft already demanded before the turn (and they are in the net take off profile performance calculations anyway)."</i></p> <p style="text-align: center;">Local</p> <p>resident/individual</p>	<p>public inquiry. Safeguarding issues in relation to departure and approach paths would have to be carefully considered to ensure there were no obstacles of sufficient height that would cause concern.</p> <p><b>Aircraft Safety</b>  Military aircraft are fined in the same way as commercial aircraft. The action plan will be updated to ensure this is made clear.  Any concerns regarding the safety of military aircraft should be made to the Ministry of Defence.</p> <p><b>Working with Public Bodies</b>  BAA has worked with the Scottish Government on the development of the action plans. A representative is also on the invitee list to the Greater Glasgow Agglomeration Action Plan Working Group. BAA hopes to continue this close working relationship going forward. The competent authority for airports is the airport operator as determined by the Scottish Government. We agree that this could cause confusion for the general public and we look to the Scottish Government and local authorities to aid us in communicating this message.</p>
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In addition, the same respondent aired their concerns regarding noise and safety issues arising from the use of the airport by military aircraft:

*"Military Aircraft. I have from time to time witnessed military aircraft at Glasgow. These do not conform to any noise limitations and some (Tornado) are invasive. What policy is extended to them?"*

*All civil aircraft either must have the ability to sustain flight in the event of an engine failure or be able to glide to a safe area. This is not the case for military aircraft as far as I am aware. For example a single engine Hawk aircraft suffering an engine failure on late finals is not obliged to remain in gliding distance of anywhere. The crew could eject and the aircraft would be left in a downwards trajectory over a major built up area.*

*Under duty of care, what steps have Glasgow Airport taken to protect those under the flightpath from that sort of eventuality???"*

Local

resident/individual

A local government respondent expressed concern about whether public bodies would have an involvement in developing the airport noise action plans:

*"[We] would raise other points as follows:-The draft noise action plan appears to cover the main proposals and it is assumed that the format follows that used for other BAA airports elsewhere in Scotland and indeed the UK. It does not make clear, however, to what extent it will work with other public bodies, particularly Local Authorities, but also the Scottish Government. As you will be aware [name of*

	<p><i>local government respondent] participated in the drafting of a noise action plan for the Greater Glasgow Agglomeration and this too, is currently out to consultation. This considers the impact on background noise from transport noise sources - road and rail - but does not cover that of aircraft. It is likely that the public, and their representatives, will be unclear why one of the main sources of transport noise - that of aircraft - are not considered."</i></p> <p>Local government</p>	
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respondent