

**CONSULTATION ON THE DRAFT NORTHERN IRELAND
ENVIRONMENTAL NOISE DIRECTIVE ACTION PLAN AND
COMPETENT AUTHORITY NOISE ACTION PLAN GUIDANCE -
SUMMARY OF RESPONSES.**

1 May 2009

**Department of the Environment in Northern Ireland.
Planning and Environmental Policy Group.
Calvert House
23 Castle Place
Belfast
BT1 1FY**



A total of 9 comments were received of which 3 were substantive. Details of the all respondents are in the table below. A synopsis of the substantive comments and the Departments responses are attached.

Respondent name	Number of responses
CAA Aerodrome Standards Department	1
Disability Action	1
Belfast City Council	1
Belfast City Airport Watch	1
Belfast Health and Social Care Trust	2
Irish Branch of the Institute of Acoustics	1
Northern Ireland Tourist Board.	1
Statutory Advisory Council Secretariat	1

Response Analysis - Consultees

This section provides a more detailed description of the comments received and also gives the Departments response. The responses to each question by each of the category of respondents has been summarised in Tables 1, 2 and 3.

Table 1 Belfast City Council

Comment	DOE Response
<p>Welcomes the fact that the Competent Authorities have developed high level strategic plans and it would encourage the Competent Authorities to move forward without undue delay.</p>	<p>Competent Authorities are required to publish Action Plans within a prescribed timetable as noted within the Regulations. The Competent Authorities intend to undertake a further consultation when they have identified specific actions. The Northern Ireland Environmental Noise Directive Steering Group (NIENDSG) has begun work in this respect.</p>
<p>Would welcome opportunity to influence the development of any future noise criteria for the identification and prioritisation of candidate noise management areas and candidate quiet areas.</p>	<p>The Competent Authorities will seek to engage with relevant stakeholders over the forthcoming months as part of this process.</p>
<p>Feels it is important to give weight to the soundscape value and residents perception of an area rather than relying solely on absolute decibel (dB) levels when considering candidate quiet areas.</p>	<p>Defra & Welsh Assembly Government are proposing to use a non prescriptive approach in identifying quiet areas.</p> <p>The NIENDSG will give consideration to this as part of the process of determining noise criteria noise management areas and quiet areas.</p>
<p>Would encourage the undertaking of a benchmarking exercise with other UK and European agglomerations.</p>	<p>Noted.</p> <p>Whilst this is not a requirement of the END, informal dialogue does occur with other authorities.</p>
<p>Development of supporting land use planning policy guidance to underpin the action plans should be brought forward on the legislative timetable.</p>	<p>The NIENDSG will engage with relevant stakeholders in taking forward Action Plans to endeavour to integrate Action Plans with planning policy.</p>
<p>George Best Belfast City Airport (GBBCA) noise action plan does not take account of their new planning agreement.</p>	<p>The GBBCA Action Plan was drafted and agreed prior to the planning agreement being amended. DOE will discuss with GBBCA the revision of the planning agreement and seek to amend their Action Plan to reflect this prior to the plan being formerly adopted.</p>

Table 2 Irish Branch of the Institute of Acoustics

Comment	DOE Response
No specific criteria have been presented for noise management and quiet areas within the agglomerations.	Noted. DOENI will work with the Competent Authorities and the NIENSG to develop a methodology to determine appropriate and robust noise assessment criteria.
Suggest that road, rail and air transportation should not be assessed in isolation where the sources combine to produce potentially a greater overall noise impact.	Regulation 42 of the Environmental Noise Regulations (Northern Ireland) 2006 places a duty on DOENI to draw up a consolidated action plan for all noise with the agglomerations. This will take account of the combined sources noise impact
Noise maps used for action planning should be those showing the consolidated values.	Noted. It is more straightforward to develop a plan for a specific source. However, it is recognised that the combined effect must not be overlooked especially when determining priorities.
<p>It would seem that the consolidated maps are not necessarily the combination of the individual road, rail and air data. This should be looked into in order to ensure that the noise climate that is being assessed at a particular dwelling is indeed the noise which is experienced there.</p> <p>It appears as though the consolidated map shows lower noise values than the corresponding individual sources of noise.</p>	<p>It may be that there has been a misinterpretation of the maps. Within the Belfast agglomeration consolidated noise maps were produced adding the results from all roads, all railways, industry and Belfast City airport. However, it needs to be noted that it was agreed between the mapping consultants and DRDNI that unclassified roads for which traffic flows were not available would not be included in the mapping. DOENI will however investigate further the comments made.</p>
Impact of road traffic noise – the maps produced imply that only major roads are included within the noise modelling. It is therefore suggested that the number of dwellings exposed to noise in excess of 55 dB L _{den} could be higher than suggested by the current noise predictions.	That is true for roads outside the agglomeration. Inside the agglomeration, nominally all roads were mapped. However, it needs to be noted that it was agreed between the mapping consultants and DRDNI that unclassified roads for which traffic flows were not available would not be included in the mapping.
Unclear as to how the noise from the industry was arrived at, therefore limited in capacity to comment.	DOENI supplied the mapping contractors with a list of industrial sites licensed under IPPC. In addition following liaison with the Belfast port authority a second set of industrial and port process sites were included. The source noise levels were derived via a methodology in line with version 2 of the Good Practice Guide, toolkit 10 as permitted by the Regulations. ISO 9613 – 2 was used to define the noise propagation characteristics.
Concerned that there does not appear to have been an assessment of the consolidated noise climate and that the consolidated noise maps are not consistent with what would be expected by the combination of the other individual sources of noise.	The limited comparisons between noise measurements and the consolidated noise mapping results that have been undertaken showed reasonably good agreement with the mapping results, if anything with the mapping results being slightly higher than the measured results.

Table 3 Belfast City Airport Watch (BCAW)

Comment	DOE Response
DoENI must ensure that published 2007 noise results for GBBCA are not exceeded. (State that the noise levels have already been exceeded.)	Noted. DOENI will discuss with relevant parties how best to take this matter forward.
Action Plan should contain an obligation to follow London City Airport's example – aircraft categories are linked to noise factors which are used in calculating the number of flights against the permitted numbers.	Noted. There is an argument for following the approach adopted by LCA given that both LCA and GBBCA are listed in Directive 2002/30/EC and subsequent regulations. However it is the responsibility of GBBCA to determine the most appropriate measures to include in the action plan.
The increases given to the GBBCA in the October 2008 planning agreement and the proposed runway extension should be classed as "major development". (Thus, reviews of the action plan will therefore be necessary before the scheduled date of 2013).	DoE consider the planned extension to GBBCA as a major development and will seek to have the action plan amended if planning approval is granted.
Believe the method of measuring and reporting aircraft noise using average noise is inappropriate. Recommend maps are based on L_{max} levels.	The END requires the noise impact to be determined by noise mapping using computer based modelling techniques. The indicators and the method used to report the noise are in accordance with the requirements of the END and regulations. The limitations of the method are recognised and understood. There could be a case for using L_{max} (or its equivalent) SEL contours to supplement the information generated from the mapping. However this is not being used anywhere else in the UK.
$L_{Aeq\ 16\ hour}$ should not be used at GBBCA because the airport is operational for 15 hours per day and therefore this metric averages in an hour of silence.	The use of the $L_{Aeq\ 16\ hour}$ indicator is the standard measure of aircraft noise impact in the UK. The limitations of the method are recognised and understood, especially in the context of an airport whose operational hours are < 16 hours.
Recommend that noise contours produced for GBBCA END action plan should be to the same standard as those produced for London City Airport. (In order to identify the number of noise sensitive premises that lie within each of the noise map contour bands).	The noise maps produced met the requirements of the END. There is no evidence to suggest that the standard of mapping is any lower than that used at London City.
Recommend that the action plan follow London City Airport's example of voluntarily agreeing to fund acoustic insulation for all residential properties and noise sensitive premises within the 57 dB(A) L_{eq} .	Noted. There is an argument for following the approach adopted by LCA given that both LCA and GBBCA are listed in Directive 2002/30/EC and subsequent regulations. However it is the responsibility of GBBCA to determine the most appropriate measures to

Comment	DOE Response
	include in the action plan.
<p>Request that the following be considered:</p> <ul style="list-style-type: none"> • 50 L_{Aeq} – WHO guideline for onset of community annoyance. • 55 L_{Aeq} - WHO guideline for onset of significant community annoyance. • 57 L_{Aeq} – contour accepted by UK Government as representing the onset of community disturbance (a lower threshold than DoENI). 	<p>Noted. The END does not make any reference to the WHO guidelines.</p>
<p>Would ask that the finding of the Attitudes to Noise from Aviation Sources in England (ANASE)report stating –</p> <p><i>“use of the L_{Aeq} measure to predict future levels of annoyance may be misleading. In particular, where numbers of aircraft are increasing significantly, the ANASE data suggest that under prediction of annoyance is likely”</i></p> <p>be taken in consideration.</p>	<p>The indicators used in the mapping and Action Plan process are in accordance with the requirements of the END and the regulations. Concerns were expressed about the robustness of the ANASE study. Care must be taken in the application of any of its conclusions.</p>

Response Analysis – Comments made about responses

Table 4 George Best Belfast City Airport

Original Comment	GBBCA Response	DOE Response
BCAW ask that the contours shown in the END Noise Maps be not exceeded.	The action plan indicates that, working in conjunction with the NIENDSG, further study will be undertaken to assess the impact of noise and set criteria for noise management and quiet areas.	Noted. DOENI will discuss with relevant parties how best to take this matter forward.
BCAW point to the 'city airport' designation of BCA and ask that this status be used to limit the aircraft types operating at the airport.	The Regulations do not provide for the competent authority to place restrictions on any aircraft that meets the chapter 4 standard. The revised planning agreement placed a cap of 48,000 total air traffic movements, compared with the cap of 45,000 air transport agreements and an unrestricted number of non commercial movements as stipulated by the previous planning agreement.	It is believed that the Regulations mentioned by GBCCA in their comment are those associated with Directive 2002/30/EC and not the END. Limiting the aircraft types using the airport could be a valid component of an Action Plan if that was felt necessary for noise management.
BCAW is of the opinion that the proposed runway extension should be classed as a major development and that the Action Plan should therefore be reviewed before 2013.	GBBCA will comply with the determination of the DoE in respect of the matter concerning the proposed runway extension and the effect this may have on the timescale for the review of the action plan.	DOENI consider the planned extension to GBBCA as a major development and will seek to have the action plan amended if planning approval is granted.
BCAW ask that noise maps be created in Lmax format.	BCA believes that the use of L_{max} criteria in the production of the noise maps, as requested by Belfast City Airport Watch, is outside of the scope of the END.	The metrics and methods used to measure and report the noise are in accordance with the requirements of the END and regulations. The limitations of the method are recognised and understood. There could be a case for using L_{max} (or its equivalent) SEL contours to supplement the information generated from the mapping. However this is not being used anywhere else in the UK.
BCAW query why LAeq, 16 hours is used when BCA is only permitted to schedule aircraft within a 15	The LAeq, 16 hour measurement is an internationally recognised standard for the assessment of aircraft noise. It might be noted that BCA is permitted to operate delayed	The indicators and the method used to report the noise are in accordance with the requirements of the END and regulations. The limitations of the

Original Comment	GBBCA Response	DOE Response
hour period?	movements for an additional 2.5 hours per day, with these movements being assessed within the 16 hour parameter.	method are recognised and understood. There could be a case for using L_{max} (or its equivalent) SEL contours to supplement the information generated from the mapping. However this is not being used anywhere else in the UK.
BCAW ask that noise maps be produced to the same standard as for London City Airport.	BCA believes that, in response to Belfast City Airport Watch's comments, the standard of the noise maps produced and available on the website are compatible with, if not superior to those for London City Airport.	The noise maps produced met the requirements of the END. There is no evidence to suggest that the standard of mapping is any different from that used at London City.
BCAW advocates that BCA fund acoustic insulation for noise sensitive properties within the 57 LAeq contour.	During the period of the action plan, BCA will work with the NIENDSG to set criteria that is appropriate for the establishment of noise action and quiet areas within the Belfast agglomeration.	Both observations are noted.

Table 5 Department for Regional Development

DRD Response	DOE Response
<p>In relation to a comment made by Belfast City Council and the Irish Branch of the Institute of Acoustics, regarding their desire to influence the development of future noise criteria, DRD note that the noise action plan states that the NIENDSG will develop a methodology to determine appropriate and robust noise assessment criteria. In the view of the DRD, Belfast City Council will have the opportunity to contribute to this consultation.</p>	<p>Noted.</p>
<p>DRD state the identification of quiet areas is the responsibility of the DoE, in response to Belfast City Council's comment that in the identification of quiet areas, it is important to give weight to the soundscape value and residents perception, rather than considering absolute dB levels.</p>	<p>Defra & Welsh Assembly Government are proposing to use a non prescriptive approach in identifying quiet areas.</p> <p>The Competent Authorities will seek to engage with relevant stakeholders over the forthcoming months as part of this process.</p>
<p>The DRD state, in relation to a comment made by the Irish Branch of the IOA that the first round noise mapping has been carried out in accordance with the Directive and NI Regulations.</p>	<p>This is true</p>
<p>The DRD wish for the consultant who produced the consolidated noise map to provide a response to the comment made by the Irish Branch of the Institute of Acoustics that the consolidated noise map produced is technically incorrect.</p>	<p>It may be that there has been a misinterpretation of the maps. Within the Belfast agglomeration consolidated noise maps were produced adding the results from all roads, all railways, industry and Belfast City airport. However, it needs to be noted that it was agreed between the mapping consultants and DRDNI that unclassified roads for which traffic flows were not available would not be included in the mapping.</p> <p>DOENI will however investigate further the comments made.</p>
<p>The DRD state, in response to a comment made by the Irish Branch of the IOA that minor roads should have been included within the noise modelling, that the noise mapping and modelling were undertaken in accordance with the Directive.</p>	<p>That is true for roads outside the agglomeration. Inside the agglomeration, nominally all roads were mapped. However, it needs to be noted that it was agreed between the mapping consultants and DRDNI that unclassified roads for which traffic flows were not available would not be included in the mapping.</p>
<p>The DRD state, in response to a comment made by the Irish Branch of the IOA that they believe the results of comparisons between the noise assessment and actual measurements taken shows a good correlation between the measured and calculated long term noise levels.</p>	<p>The limited comparisons between noise measurements and the consolidated noise mapping results that have been undertaken showed reasonably good agreement with the mapping results, if anything with the mapping results being slightly higher than the measured results.</p>