



Birmingham Airport anti-Noise Group (BANG)
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Lawrence Osborne
Area Planning Officer
Solihull Metropolitan Borough Council
PO Box 11652
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22nd February 2008

Dear Mr Osborne,

Application number: 2008/0022

Location: Birmingham International Airport Ltd, Birmingham International Airport, Solihull B26 3QJ

Proposal: Extension of Main Runway and associated infrastructure, including the realignment and tunnelling of a section of the A45 Coventry Road; a new Air Traffic Control Tower; revisions to the existing Fuel Farm; a new Exit Taxiway; the treatment of obstacles; and the diversion of services and watercourses.

I am writing to **object** to the aforementioned planning application ('the Planning Application') on behalf of Birmingham Airport anti-Noise Group (BANG).

Although our objection focuses mainly on noise and property blight, we support the objections raised by Birmingham Friends of the Earth, namely (a) that the proposal to extend the Main Runway at Birmingham International Airport (BHX) fails to satisfy criteria i-vii of Policy T15 of Solihull's Unitary Development Plan (UDP) 2006, and (b) that the proposed runway extension and the growth of the airport generally will generate an increasing volume of greenhouse gas emissions at a time when the need to reduce emissions from all sources is widely accepted.

The Environmental Statement produced for the Airport Company by Ove Arup & Partners (Arup) and submitted as part of the Planning Application includes details of the latest Air Noise Study carried out for the Birmingham International Airport (BIA) Limited ('the Airport Company') by the Civil Aviation Authority's Environmental Research and Consultancy Department (ERCD). This study predicts that the number of local people exposed to aircraft noise levels sufficient to cause 'significant annoyance' (i.e. the population encompassed by the 57 dB LAeq noise contour) will rise from 26,800 in the daytime and 5,100 at night in 2006 to 55,150 in the daytime and 9,000 at night by 2030 if the proposals set out in the current Airport Master Plan (November 2007) go ahead.

ERCD modelled two expansion scenarios, the 'with runway extension' scenario, in which the airport begins operating the extended runway early in 2012, and the 'no runway extension' scenario, in which the airport continues to expand its operations up to 2030 without extending the runway. Under the 'with runway extension' scenario an extra 8,100 people and 3,450 households will be exposed to significant daytime aircraft noise by 2030, compared with the 'no runway extension' scenario. Operating a longer runway at BHX will mean closer and lower flights over residential ar-

eas and the use of larger, and therefore noisier, aircraft. It will also mean that the 'Hampton Turn' the southerly departure route which takes planes away from the village of Hampton-in-Arden, will no longer be possible.

Despite individual aircraft having become considerably less noisy over the years, we cannot rely on technology alone to solve the growing noise problem. Since the introduction of the first jets the noise reductions achieved through incremental refinement of aircraft engine and airframe design have tended to be offset by the introduction of larger aircraft, more frequent flights (often at sensitive times of day) and growing community expectations.

In 2000, the Advisory Council for Aeronautical Research in Europe (ACARE) set an ambitious target to reduce perceived aircraft noise by 50 per cent of 2000 levels by 2020. But even if manufacturers can deliver the technology in time, which is by no means certain, the absence of regulation requiring airlines to phase out older, noisier planes from their fleets means that uptake of new quieter aircraft is likely to be too slow to prevent the number of people exposed to significant aircraft noise continuing to grow. What's more, some of the technological measures which might reduce the climate-change impacts of aviation could worsen noise or air quality problems, and vice versa.

The noise mitigation measures offered by the Airport Company can help reduce the impact on the community, but they go nowhere near far enough. BIA Limited operates a Sound Insulation Scheme for local homeowners, providing high specification double or secondary glazing with mechanical ventilation and loft insulation to reduce the impact of aircraft noise. However, this scheme only covers properties located within the 63 dBLAeq noise contour, despite the fact that 'significant community annoyance' is widely considered to begin at 57 dBLAeq. This means that although the proposed runway extension will expose 3,450 more households (compared with under the 'no runway extension' scenario) to significant daytime aircraft noise by 2030, only 800 households would become eligible for sound insulation under the present scheme.

The World Health Organisation recommends that noise abatement measures should also take into account residential outdoor as well as indoor activities, but as local residents have pointed out, 'you can't double-glaze a garden.'

BANG considers that any increase in aircraft noise exposure over current levels represents an unacceptable noise impact. We therefore strongly recommend that Solihull Metropolitan Borough Council uses the opportunity afforded by the Planning Application to consider placing a condition on expansion of BHX similar to the condition the Government has placed on the expansion of BAA Heathrow. The Department for Transport's 2003 White Paper 'The Future of Air Transport' stated that any further development at Heathrow would only be considered on the basis that it resulted in *no net increase* in the total area of the 57 dBLAeq noise contour compared with the size of the contour in summer 2002.

We are also concerned that the Airport Company has not considered the 'generalised blight' effect of the proposed runway extension on the local property market. Whereas the Airport Company consulted with local estate agents and solicitors in January-March 2006 to determine the extent and severity of the blight created by the proposals for a Second Runway (an issue that has still not been adequately addressed), no such consultation has to our knowledge been undertaken in the case of the current plans to extend the Main Runway.

James Botham
Secretary
Birmingham Airport anti-Noise Group (BANG)
February 2008