

These comments are being submitted on behalf of **Backwell Residents' Association (BRA)** which is a membership organisation representing the interests of over **400 paid up households** in the village of Backwell.

Introduction

1. Thank you for the opportunity to comment on your draft Noise Action Plan 2019/24. We write not as experts in noise measurement but as a community which due to its close proximity to the airport is directly affected by the noise stemming from it and the aircraft that use it. Backwell is an extensive village comprising four residential areas joined by countryside on a hillside and much of it wooded. One of the four areas, Downside, shares a boundary with the airport while the other three areas, Farleigh, Church Town and West Town are at the bottom of the hill. Noise from the airport is therefore very different in the different areas. We appreciate that none of Backwell lies on the direct flight path, nonetheless, the village is affected by aircraft noise.
2. We offer our comments in two groups: General and Section specific.

General Comments

3. We welcome many aspects of the plan and as such would expect to see these contained in the issued plan. We believe an annual report on plan progress to a wide range of your stakeholders including the local community would improve understanding among these groups.
4. We have focused our comments on commercial aircraft rather than the much smaller and fewer in number private aircraft. The latter are not considered a problem at present but we remain alert to the possibility of increased noise from that source.
5. We note and generally support the airport's expansion plans with the economic benefits that this brings to the area provided that the overall level of noise is controlled.
6. We believe that noise needs to be reduced at source. The aircraft themselves, whether on the ground or airborne, are the greatest source and so we wish to see greater encouragement for airlines to use quieter aircraft with even more severe penalties for noisier ones.
7. We are pleased to read of your actions to reduce noise but find them perhaps over-simplistic. We encourage you to consider a tiered approach to actions with targets set at progressively more challenging levels as time progresses to encourage continual improvement.
8. We were surprised to read about the information that the airport publishes on noise measurement for example. We believe few in the local community know of your work, which we commend. The website is heavily focused on travel and using the airport; we would like to see an area dedicated to the local community which is clearly visible from the Home Page. The current location does not meet this test.
9. We are not convinced of the need going forward of scheduled aircraft movements at night from 23:00 to 06:00. We note the quota system which we believe allows too many flights and look for all night flying, except in emergencies and to accept delayed aircraft, to cease.

10. We note the intention for flight path changes and ask that the local community is fully considered in the consultation process.
11. We would ask that Backwell Residents Association is included in your list of contacts to receive all consultation material in future. This should be addressed to myself at smveal@talktalk.net

Section Specific Comments

Section 1 – Executive Summary

12. We are surprised that you only show 9 out of 37 actions as closed. As a headline this suggests that little progress has been made on the actions in earlier Noise Action Plans. More detailed examination of the actions taken suggest that many of the actions can be considered “business as usual” and so should be shown as closed. We offer a view on progress on every action in section 8. In our opinion a further 16 actions could be shown as closed.

Section 2 – Aims and Framework of Our Noise Action Plan

13. A section such as this is very helpful to the novice reader as it identifies key points and sets out clearly in simple terms what is to be expected. We would encourage you to continue this approach with all your consultation documents.

Section 3 - Introduction

14. We are pleased to see that you recognise that “Noise from aircraft operations continues to be a significant concern for some of our surrounding communities.”

Section 4 – Airport Description

15. No comment to make. This is a factual description of the airport for those unfamiliar with it.

Section 5 – Noise and Regulation, Guidance and Reports

16. We note the regulations that the airport has to comply with regarding noise. Not having been aware of this list we found this useful and look for it to be included in the final plan.

Section 6 – Noise Management Framework

17. We welcome your acknowledgement of quieter aircraft. We wish to see you encourage yet quieter aircraft however you see fit using progressive noise reduction metrics.
18. We note the noise quota on night flying that is in operation during the period 23:30 – 06:00. We believe this period should commence 30 minutes earlier immediately with a progressive reduction of night flying over the period of the plan to a figure of zero flights. We question the need in today’s world for night flying from Bristol Airport. We note Heathrow’s voluntary ban for flights before 04:30 and Heathrow’s primary need to receive flights predominantly from south and south-east Asia between 04:30 and 06:00. Bristol receives no aircraft from such areas.
19. We welcome your noise monitoring at fixed points and mobile points by request. We are unclear what actions are taken in a timely manner as a result of the measurements. Publishing an annual report, while welcome, does not appear to make best use of the data that you are collecting. We are also unclear what penalties are imposed on noise polluting aircraft.

20. We welcome your openness to receiving complaints about noise. We believe that many in the local community are not aware that they can do this or how they should do this. An area on the front of your website dedicated to making noise complaints would make this much more obvious. An action for your plan should include investigation and implementation of ways to make noise reporting easier.

Section 7 – Results of the 2016 Noise Mapping

21. We note the overall noise level reductions between 2011 and 2016 in the two categories “highest” and “moderate”. We look for this downward trend to continue during the lifetime of the plan.

Section 8 – Action Plan

22. **New actions.** We find the layout difficult with new actions interspersed within existing part and fully complete actions. We suggest new actions are placed at the end of each section to highlight them. We believe many of the actions should be marked as closed as they are now part of the airport’s “business as usual”. If not closed now, they will never be closed. The actions relate to procedures which in an effective management system should be regularly reviewed.
23. **Action 1.1.** As an action we believe this should be marked as closed as it is now part of the airport’s “business as usual”.
24. **Action 1.2.** As an action we believe this should be marked as closed as it is now part of the airport’s “business as usual”.
25. **Action 1.3.** We note the action is closed. You might set a target for phasing out all non-electric powered vehicles, exempting those for which a business case can be made.
26. **Action 1.4.** We welcome completion of this action. We welcome the new action but as this is a five year plan believe it should be expanded to include implementation of the study recommendations.
27. **Action 1.5.** We believe this action to be imprecise with no measurable indicators to determine when it is complete. We wish to see this reworded noting it comes from an earlier plan.
28. **Action 1.6.** As an action we believe this should be marked as closed as the work is complete. We welcome the new action but as this is a five year plan believe it should be expanded to include implementation of the review work.
29. **Action 2.1.** We note this action is closed. We believe there should be a new action to incentivise airlines to operate the newest quietest aircraft from Bristol and continually increasing surcharges with time to encourage continual improvement.
30. **Action 2.2.** As an action we believe this should be marked as closed as it is now part of the airport’s “business as usual”. We welcome the new action on aircraft fee differentials based on aircraft noise.
31. **Action 2.3.** As an action we believe this should be marked as closed as it is now part of the airport’s “business as usual”. We welcome the new action but believe there should be a commitment to setting more stringent targets with time to encourage continual improvement.

32. **Action 2.4.** We believe the effectiveness of this action would be enhanced considerably with the inclusion of a measurable target to determine when the action is complete or not.
33. **Action 2.5.** We note completion of this action. We welcome the new action but believe there should be a commitment to setting more stringent targets with time to encourage continual improvement.
34. **Action 2.6.** As an action we believe this should be marked as closed as it is now part of the airport's "business as usual". We welcome the new actions. We wish to see you conducting early work to establish communication channels for the action on alternative flight paths. We will be happy to participate.
35. **Action 2.7.** As an action we believe this should be marked as closed as it is now part of the airport's "business as usual". We note the new action but believe that night flying between 23:00 and 06:00 should be brought to an end.
36. **Action 2.8.** As an action we believe this should be marked as closed as it is now part of the airport's "business as usual". We support your consultation with the general aviation community in the new action but believe it would benefit from the inclusion of a measurable target to determine whether the action is complete or not.
37. **Action 2.9.** We welcome completion of this action and the new action.
38. **Action 2.10.** We welcome completion of this action.
39. **Action 2.11.** We note this action continues. We believe it would benefit from the inclusion of a measurable target to determine whether the action is complete or not.
40. **Action 2.12.** We note the action is part complete. No date is given for changes to the north of the airport which may affect Backwell. We believe the existing and new action would benefit from the inclusion of a measurable target to determine whether the action is complete or not.
41. **Action 2.13.** We note this action and welcome the on-going work. This might be considered "business as usual".
42. **Action 2.14.** We note and welcome the on-going work. We believe the new action would benefit from the inclusion of a measurable target to determine whether the action is complete or not.
43. **Action 2.15.** We are unclear why this is listed as a separate action when it is covered by actions 2.11, 2.12 and 2.14.
44. **Action 3.1.** As an action we believe this should be marked as closed as it is now part of the airport's "business as usual".
45. **Action 3.2.** As an action we believe this should be marked as closed as it is now part of the airport's "business as usual". We fail to understand the introduction date of the new action. As the plan is for 2019-2024 why is there a date of 2018?
46. **Action 3.3.** We note this action is complete. Measurement of completion of the new action is difficult.
47. **Action 3.4.** We note this action is complete. We fail to understand the date of the new action. As the plan is for 2019-2024 why is there a date of 2018?

48. **Action 4.1.** We note this action continues. We welcome the new actions. We would like to see an area on the airport website dedicated to the local community which is clearly accessible from the Home Page from where the new tool can easily be accessed.
49. **Action 4.2.** As an action we believe this should be marked as closed as it is now part of the airport's "business as usual".
50. **Action 4.3.** As an action we believe this should be marked as closed as it is now part of the airport's "business as usual". We welcome the new action. We would like to see an area on the airport website dedicated to the local community which is clearly accessible from the Home Page from where the new tool can easily be accessed.
51. **Action 5.1.** We note the action which is now part of the airport's "business as usual"; however we were unaware of this activity and believe much more needs to be done by the airport to publicize such laudable initiatives. We welcome the new action. We would like to see an area on the airport website dedicated to the local community which is clearly accessible from the Home Page from where the new tool can easily be accessed.
52. **Action 5.2.** As an action we believe this should be marked as closed as it is now part of the airport's "business as usual".
53. **Action 5.3.** As an action we believe this should be marked as closed as it is now part of the airport's "business as usual". We welcome the new action which should be part of the automatic regular review of all procedures and measures.
54. **Action 5.4.** As an action we believe this should be marked as closed as it is now part of the airport's "business as usual". We welcome the new action but wish to see more effort from the airport to publicize this laudable initiative.
55. **Action 5.5.** As an action we believe this should be marked as closed as it is now part of the airport's "business as usual". We welcome the new action but believe this is part of regular review undertaken by all effective management systems.
56. **Action 5.6.** We note the action is closed and welcome the new action but wish to see more effort from the airport to publicize this laudable initiative.
57. **Action 5.7.** As an action we believe this should be marked as complete as it is now part of the airport's "business as usual". We welcome the new action but believe this is part of regular review undertaken by all effective management systems.

Section 9 – Evaluating implementation

58. We welcome your intention to provide an annual update on the implementation of the Noise Action Plan. Having reviewed how the airport will improve its engagement with the local community we look forward to the annual update being very much more accessible.
59. We would be pleased if you could write via e-mail to inform us when the annual update is available to read.

Section 10 – Long Term Strategy

60. While the words in this section are true we see no relevance to noise. We believe this section must set out what the long term strategy for noise reduction is. The next noise action plan 2025-2030 will then be able to address its implementation.

In Conclusion

61. We look forward to hearing from you in response to our submission and to receiving the information that you publish intended for the local community.

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