Dear Sir


Belfast City Council has received and reviewed the George Best Belfast City Airport - Environmental Noise Directive Round Three - Draft Noise Action Plan 2019-2024 and would provide the following comments by way of response.

The Council welcomes the publication of the third round of aircraft noise mapping for the Belfast Agglomeration and notes that the maps have been produced for the Airport based on aircraft movements in 2016, these maps having been formally adopted by DAERA during 2017.

The Council notes that George Best Belfast City Airport has determined that the number of dwellings exposed to noise levels of greater than 50 dB LAeq 16 hour has reduced from 25,326 in the second round of noise mapping (2011) to 15,475 dwellings in the third round of noise mapping (2016) with a corresponding drop in population exposure from 51,955 to 34,348 persons.

The Council additionally notes that there has also been a reduction in the size of all END indicators in round 3 as compared to round 2 with the exception of the 65 – 69 dB L$_{night}$ contour band, although this noise band contains no residential or sensitive receptors.

The reduction in the size of mapped contours and accompanying reduction in the number of dwellings and population exposed to higher noise bands appears to be largely due to a change in the fleet mix at the Airport, with a reduction in the number of jet aircraft movements and an increase...
in the number of turbo propeller type aircraft. The Dash 8 Q400 is considered to be a relatively quiet aircraft, which presently makes up a large proportion of overall aircraft movements at George Best Belfast City Airport.

The Council notes that the top 1% of the population exposed to the highest noise levels above 50dB LAeq 16 hour equates to 343 people or approximately 155 dwellings as compared to 520 people and 250 dwelling in round 2. This top 1% includes 2 dwelling exposed to 59 – 60 dB LAeq 16 hour and 153 dwellings exposed to 58 – 59 dB LAeq 16 hour. These dwellings are located next to the Sydenham Bypass in the areas of Sydenham and Ballymacarrett.

Accordingly, George Best Belfast City Airport, upon consideration of the noise reduction measures already in place, including those contained within the 2008 Planning Agreement and the existing voluntary measures listed within their round 2 noise action plan, the community attitudes survey and the regulatory and policy framework has concluded that it is inappropriate to designate any ‘Important areas’ as ‘Candidate Noise Management Areas’.

The Council recognises however, that the onset of annoyance or nuisance can occur in lower noise contour bands and that the Environmental Noise Directive does not preclude competent authorities from considering the impact of noise beyond the top 1% of the population affected. On this basis, the Council would recommend that George Best Belfast City Airport should consider actions that might be taken to reduce exposure to aircraft noise in these lower level noise contour bands.

The Council notes that there is a reduction in the number of schools and colleges exposed to more than 50 dB LAeq 16-hour and that no hospitals or hospices are located within this noise band. Whilst none of these premises qualify for noise insulation, the Council notes and acknowledges that George Best Belfast City Airport supports a number of local educational institutions through its Community Fund and Corporate Social Responsibility Programme.

Whilst there are no residential or ‘sensitive premises’ that qualify for a Noise Insulation Grant at this time, the Council notes that END does not specify what constitutes ‘sensitive premises’. George Best Belfast City Airport has referred to the Department for Environment, Food and Rural Affairs’ guidance for airport operators in England and thus the Airport has considered schools, colleges, hospitals and hospices. The Council would recommend however, that Residential and Nursing Homes should be considered as sensitive premises for the purposes of future noise insulation qualification criteria.
In advancing these recommendations, the Council recognises that George Best Belfast City Airport will have to consider the economic costs of any proposed actions and balance them against the health improvements that might be achieved.

Yours sincerely