

Mr Mark Swan- Group Director Airspace Policy
Civil Aviation Authority
CAA House
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1 July 2016

Dear Mark

I write following the Civil Aviation Authority's (CAA) recent publication (CAP1368) regarding the Standard Instrument Departures (SIDs) from Birmingham Airport's runway 15. I am delighted that the CAA has decided to approve the Option 6 (2Y) SIDs, however you will be aware of the condition to undertake a further trial and I set out below some comments I have relating to this.

We have immediately taken action to address condition 1 and Birmingham Airport Limited (BAL) has, in liaison with your Team, and community stakeholders, been investigating the practicalities of carrying out the trial for non-jet aircraft to fly the Option 5 (1L) SIDs on southerly departures. Following detailed correspondence with the CAA, and upon receipt of a draft methodology, I must advise that BAL has a number of reservations regarding the feasibility of undertaking the trial, which I have detailed below for your consideration. I have also enclosed a copy of the draft trial methodology for ease of reference.

Fundamentally, BAL believes that enough data exists to allow the CAA to assess whether or not a scenario of non-jet aircraft flying Option 5 and jet aircraft flying Option 6 could alleviate the impact on the community of Barston. Further modelling could be considered to fully assess the scenario, without initiating a trial that would provide sufficient evidence to convince all stakeholders that condition 1 has been addressed. We would highlight the following points;

- **Decline in non-jet operations**
Since the trial of Options 5 and 6 began (in 2014), there has been a decline in the number of turboprop aircraft utilising southerly headings i.e. those using Option 6. As such there is now an average of just 3 turboprop aircraft on departure using these routes each day, compared to 9 per day in 2014. This therefore raises the question with regards to the benefits a trial would bring, given the fact that it reflects such a small number of total departures.
- **Non-jet operations on Option 5 has an insignificant noise difference (0.1dB(A))**
Given the small number of movements, BAL proposes that the CAA instead re-examines the noise data gathered as part of the original trial. This noise monitoring shows that during the trial there is a 0.1 dB(A) difference when comparing the L_{max} levels at Barston with turbo-prop aircraft operating on Option 5 when compared to Option 6. See table overleaf.

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Average noise different Option 5 and 6 Movements at <u>Barston</u>					
	Option 5		Option 6		
Aircraft Type	Number of Movements	Average Max Level	Number of Movements	Average Max Level	Difference
DH8D	40	67.2	64	67.4	0.1

- **Further LAeq noise modelling could be considered**

To consider potential future growth in non-jet traffic, it may be appropriate to model a scenario of turbo-prop using Option 5 and non-turbo props utilising Option 6 using, LAeq noise contours. Although your Environmental Research and Consultancy Department (ERCD) department has advised that the scenario is unlikely to lead to a change in the contour shape, BAL is happy to commission the work to demonstrate that the scenario has been given full consideration, but will have no change in impact on Barston.

BAL has significant concerns regarding the trial methodology, both in terms of its purpose, what the trial is assessing (i.e. perception), and the practicalities of obtaining and assessing data. We would make the following observations:

- **Concerns that flight path decision to be based upon individual perception**

Firstly, we are unclear as to what we are actually assessing here. As you will know, the noise data demonstrates that there will be no perceptible difference in noise levels in Barston resulting from the trial. The draft methodology suggests that the decision whether or not to permanently adopt the scenario will be based upon the percentage of people that are either 'very annoyed' or 'extremely annoyed' in each community with the community registering the highest percentage seeing the decision made 'in their favour'. BAL is therefore concerned that an airspace decision will be made based upon on individual perception. Further to this concerns have been raised by community members that the results could be manipulated by utilising tools, such as flight radar 24.

- **The scenario posed is not considered to be offering 'respite'**

It is also unclear of the benefits of mixing traffic that is departing using Option 5 and Option 6. The decision document defines respite as 'planned and predictable alleviation from aircraft noise'. However, in the scenario proposed you may have 2 jet aircraft departing using Option 6 followed by a turbo-prop using Option 5 which is then followed by another 3 jets using Option 6. I am sure you will agree that this will not bring about any predictable or timely respite for the community of Barston.

- **Challenges over the practicalities of implementation**

Moving onto the practicalities, my Sustainability Team, together with our IT department have undertaken an initial investigation into how we might facilitate the data collection and the investigation process for the trial. Given the variables involved (identification of aircraft type, consistency of timing etc.) the best way forward would be to develop an application, or computer software. Given that this will take some time and investment to develop, it is very unlikely that BAL will be able to carry out the trial in the summer of 2016, in line with the CAA's request.

- **Challenges obtaining appropriate sample size**

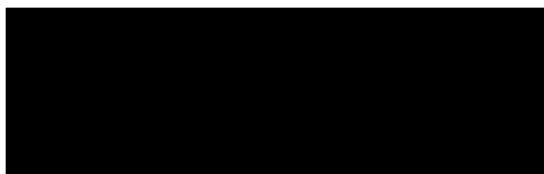
Your ERCD department advises that there should be no fewer than 50 willing participants from each community of which none should co-inhabit the same property. Due to the relatively small size of the communities that are been considered (Barston and Balsall Street East) this will make gaining a representative sample from each community significantly challenging, if not impossible.

BAL appreciates that this is a sensitive situation and supports the CAA's request to consider all options to minimise the impact of aircraft noise on the community of Barston. BAL believes that this can be met by delivering the changes to the northbound turn Option 4 (which is anticipated to take aircraft further from Barston) and BAL is committed to delivering on the CAA recommendations 2 and 3.

Fundamentally, BAL firmly believes that condition 1 can be addressed via further noise modelling and not a trial. This could be pursued quickly and BAL believes that this is in the best interest for all stakeholders, putting an end to the uncertainty experienced over the last 4 years.

I shall look forward to hearing from you.

Yours sincerely



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