

LAANC

Local Authorities' Aircraft Noise Council

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Airports Commission
c/o emerging.thinking@airports.gsi.gov.uk

31 October 2013

Dear APC Team,

The Local Authorities' Aircraft Noise Council (LAANC) welcomes the opportunity to respond to the commission's "emerging thinking" on behalf of two dozen Local Councils comprising Boroughs, Unitary Boroughs, London Boroughs, County and Parish Councils serving a wide area around Heathrow Airport. The Constitution of LAANC covers environmental issues as well as noise and represents a very large community many of whom have direct contacts with Heathrow.

We are not surprised to learn that noise has generated more responses to the Airports Commission than any other single issue. The fact that around 98% of the responses to the commission's noise consultation concerned Heathrow reflects the size of the noise problem. LAANC urges the commission to accept that for a huge number of people (we say around 1 million) aircraft noise from Heathrow is currently unacceptable and this has been the case for years.

In its deliberations we also urge the commission to be cautious about claims being made from both the airport and airlines that the noise problem at Heathrow will continue to diminish by reference to what is known as the 57decibel contour. It is a fallacy that aircraft noise around Heathrow noise has "got better" over the last fifteen years or so.

Current methods of noise assessment are mostly based on surveys which are over 30 years old, with hindsight the results of these surveys never have provided a reliable basis for predicting community annoyance. In particular they were never calibrated for communities newly overflown by airport development (as would occur in the event of a new runway at Heathrow).

The government's reliance on the 57 L_{Aeq} average mode contour to define 'the onset of significant annoyance' is misplaced. Not only is the 57 contour out of calibration but with the benefit of improved survey methods it has been shown that the social survey methods used in the ANIS study carried out in 1980 and 1982 do not meet current best practice. The 2007 UK ANASE study carried out in 2005/6 and published in 2007 is to be preferred as it was better designed and executed. It found significantly different dose-response relationships to the 1980 ANIS work. The commission should consider the results of the ANIS study to be a better indicator of likely numbers of people annoyed by any given level of aircraft noise.

Recent research commissioned by Heathrow local authorities and submitted to the commission (ANASE update study) has shown the results of the 2007 ANASE

study to be entirely consistent with similar research carried out around major European airports in recent times. Criticism of the ANASE study by government appointed peer reviewers in 2007 has been shown to be unfounded.

In our view the fact that some 75% of respondents to the commission's consultation expressed opposition to further expansion of Heathrow is also unremarkable. Heathrow has different problems to most other locations as it already suffers from the inadequacy of the infrastructure (as demonstrated by the now constantly congested M25). The development of Crossrail, the Western Rail Access, HS2 and a possible South London Line are only designed to address current surface access deficiencies. They will not deal with the demands generated from an extra runway.

Provision of even more housing and other facilities for staff of the airport and the anticipated increase in business activity in an area which has seen one of the highest levels of post war development, in the UK will be a great challenge and for many will result in a reduction in quality of life. Heathrow's location means that it can function as a true 24/7 global hub airport. It is unthinkable that more night flights could ever be sanctioned at this location, however but without them it is difficult to see how the airport can serve emerging markets in the far east.

In LAANC's view the bulk of the UK aviation market is such that there are very few routes where sufficient connectivity cannot be provided by allowing the three main London Airports to compete with each other and in effect form a "London Hub". No weight should be attached to results of the recent Heathrow Airport Sponsored "survey" which claims that without another runway Heathrow will be forced to close.

LAANC also urges the commission to be cautious about the extent to which fleet renewal can be a game changer so far as noise is concerned.

Although it is the case that aircraft manufacturers have made great efforts over the last 30 years to reduce the noise footprint of individual aircraft over the ground, no new step change in noise reduction can be expected either with the current generation of aircraft coming into service (such as the Airbus A380) or those that are currently at the design stage. At Heathrow the CAA's own measuring data show that at distances further out from the official noise certification points, noise from an A380 is perceptibly no better than the older Boeing 744s that are being replaced. Thus for residents of areas such as Windsor and Putney the new aircraft are currently offering no improvement in noise terms.

Regarding Heathrow Operational Freedoms, the Commission should reject the submission from Heathrow Airport which seeks approval to implement a number of significant changes to the established operational pattern at the airport. The CAA's own report into these trials concludes that there is no demonstrable benefit in terms of improved resilience or punctuality. The airport disingenuously claims in its final OF report that the findings of the OF study have been agreed by local authority stakeholders. This is wrong. A number of queries raised by local authority representatives remain outstanding, particularly the results of the social study, which involved a very small sample size at a time when the airport were seeking to get the agreement of airlines to move some of the pre 05:00 flights to a later time. Subjects were invited to indicate if they would support the concept of OFs as a "give and take" exercise. Most subjects responded that they supported such a proposition. The airlines however vetoed the later arrival initiative. It is not known to what extent support for the OF study was bolstered by the "carrot" of less pre 05:00 arrivals.

LAANC believes the complaint data collected during the OF trials speaks volumes

about the “disadvantages” of the OF programme. These have not been monetised and offset against the claimed very modest financial savings claimed.

Two important conclusions can be drawn from the OF trials in terms of community impact. These are:

- (i) Residents overflowed by Heathrow traffic may not be aware of exactly when they should be getting respite but when they don't get any they are very much annoyed (respite is thus shown to be important in terms of any future development at Heathrow).
- (ii) Residents who are newly overflowed (as in the case of those affected by early vectoring) can be predicted to be massively more sensitive to aircraft noise than communities who have become habituated to it. This is important in terms of future compensation that will need to be paid in the event of any new runway provision.

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Chairman LAANC