

Consultation Response

Dear Sir Howard Davies,

I am strongly objecting to expansion of Heathrow airport in the grounds that increased flight noise will cause my business to suffer.

I am a sound engineer and during recent trials I was deeply affected by the impact of excessive flight noise over my home and area of work. I had to suspend recording on several occasions.

I also would urge the commission to reconsider a more substantial report on noise that uses the WHO standards of noise measurement to analyse the effect on the local population. There needs to be more incisive and comprehensive measurement (and subsequent analysis) from monitoring on the ground in places such as Teddington, which do not currently reside with official noise contours. The noise quality of life and place assessment only give a partial picture of the cost of expansion of Heathrow- this does not allow one to make a meaningful decision based on inadequate evidence.

In answer to your first question:

1/ Heathrow Third Runway

Expansion of Heathrow is not essential for its economic survival nor that of London. The human costs and impact on quality of life far outweigh any financial gain or employment generated by a bigger Heathrow. Evidently a third runway will lead to a fourth and so on- the impacts of which on some of the most densely populated parts of Europe will be immense.

Economy: 30% of Heathrow's passengers are business travellers, this number is declining year on year- the concept of hub status linked to transfer traffic is declining and the tide towards other hubs such as Dubai cannot be turned.

- Point-to-point travel is increasing with lighter, more fuel-efficient air craft

- Making Heathrow into a large monopoly will not encourage the cornerstone of a market economy, competition.

- Should VAT be added to fuel, travel will decrease.

- In the future, there will be a move towards 'cleaner' industries away from carbon consuming industries such as aviation. At the moment, Heathrow is exceeding pollution limits.

- Interconnectivity between airports should be encouraged and measures to maximize capacity efficiency could be introduced to ensure that the already well-served Capital city are used to the best they can.

- The financial costs of Heathrow have been underestimated.

Zac Goldsmith, MP, stated at the public conference to the Davies Commission in December, 2014. 'In the medium term, during construction, how can Heathrow possibly divert the M25 and the A4 and carry out works to other minor roads within the same timeframe without causing absolute mayhem for years? What is the cost of that disruption to the economy? Has anyone even assessed that cost? Is it right for the public to pay those costs not once but twice – for the actual improvements themselves and then through a substantial congestion charge in order to limit the damage to West London's economy by minimising congestion?'

Noise

Experts cannot guarantee claims that there will be quieter jets in the future. If NATS had to undertake a six-month trial to test the turn of aircraft, it is fair to say that the unknowns surrounding the distribution of sound and modern aircraft will not be a certainty either. It will be impossible for Heathrow to enforce regulation and weed out

older aircraft from the external airlines that use the airport. So newer, quieter jets are a dream for a long while yet.

-Impacts of noise on people and supporting studies:

1. Children's cognition and aircraft noise exposure at home--the West London Schools Study.

Matsui T1, Stansfeld S, Haines M, Head J.

Noise Health. 2004

Abstract: Cohort: Two hundred thirty six children attending 10 primary schools around Heathrow Airport.

A significant dose-response relationship was found between aircraft noise exposure at home and performance on memory tests of immediate/delayed recall...These results suggest that aircraft noise exposure at home may affect children's memory.

2. Aircraft and road traffic noise and children's cognition and health: a cross-national study.

Stansfeld SA1, Berglund B, Clark C, Lopez-Barrio I, Fischer P, Ohrström E, Haines MM, Head J, Hygge S, van Kamp I, Berry BF; RANCH study team.

Lancet. 2005

INTERPRETATION:

Our findings indicate that a chronic environmental stressor-aircraft noise-could impair cognitive development in children, specifically reading comprehension. Schools exposed to high levels of aircraft noise are not healthy educational environments.

3. Exposure-effect relations between aircraft and road traffic noise exposure at school and reading comprehension: the RANCH project.

Clark C1, Martin R, van Kempen E, Alfred T, Head J, Davies HW, Haines MM, Lopez Barrio I, Matheson M, Stansfeld SA.

Am J Epidemiol. 2006 Jan 1;163(1):27-37. Epub 2005 Nov 23.

Findings were consistent across the three countries, which varied with respect to a range of socioeconomic and environmental variables, thus offering robust evidence of a direct exposure-effect relation between aircraft noise and reading comprehension.

4. A follow-up study of effects of chronic aircraft noise exposure on child stress responses and cognition.

Haines MM1, Stansfeld SA, Job RF, Berglund B, Head J. Int J Epidemiol. 2001 Aug;30(4):839-45.

RESULTS AND CONCLUSIONS:

At follow-up chronic aircraft noise exposure was associated with higher levels of annoyance and perceived stress, poorer reading comprehension and sustained attention, measured by standardized scales after adjustment for age, social deprivation and main language spoken.

Noise Measurement

Noise in your supporting reports is not measured according to WHO standards. Places like Teddington, are not included in noise contours because we do not suffer peak noise over sustained periods, but as noise events during Easterly operations.

Noise modeling is inadequate as a means of testing the true impact of noise disturbance on inhabitants.

Noise impact studies should take account of empirical data from the ground at prominent sites and truly measure isolated events and their impact not averaging them out over a whole year.

Any quality of life study should also consider the way that noise can polarise communities and how sleep deprivation can affect people's work. Also, the disempowerment and health impact of dealing with an entity that does not respond to complaints except by automated response.

Complaints/ Community Relations

The disempowerment and real consequences on peoples' lives is immeasurable as the debacle that was the trials experience last year in Teddington shows, where Heathrow assured us that noise modeling had told them that we would be unaffected.. (7,000 petitioners later, they changed their minds.)

Pollution and the Environment

The impact on the environment cannot be couched in the terms that as long as all other offenders tone down their act Heathrow's excesses will be excusable.

Heathrow is already responsible for more CO2 emissions from international, scheduled passenger flights than any other airport in the world. The Commission's own sustainability assessment predicts that national aviation emissions would be higher than the level consistent with the Climate Change Act if any of the proposals go ahead. New runway proposals are inconsistent with UK climate change commitments unless unspecified action is taken by Government to cap aviation emissions

Infrastructure

The impact on infrastructure and roads surrounding Heathrow needs to be taken in to account. We cannot just hope that Heathrow cut down on 'kiss and drops' and that the projected leap in freight air traffic will not translate in to excessive traffic for our roads. The weight of traffic of 25 million road passenger journeys will create excessive pollution. It's unrealistic to assume that we can enforce carbon capping on all other modes of transport to counter the amount produced from an expanded Heathrow. There is no remit to introduce congestion charges for road users so it is unclear how this would be regulated.

Housing

Jobs will be created, there is no denying it but where will these people live? I don't think enough provision has been made for workers, having heard attended the public conference and listened to arguments suggesting that the housing would be in short supply and unaffordable.

2/ Heathrow Hub

This option has some factors that are very worrying in terms of pilots saying that they will not be able to land with the angle of the proposed extension.

Huge swathes of neighbouring countryside and historic sites such as Windsor and Eton will be blighted by aircraft noise and the consequences of the development associated with expansion.

Heathrow Hub is unsustainable without the backing of Heathrow, how is this not a 'Heathrow-lite' option? Whereby Heathrow will gain expansion in any case at some future date?

3/ Gatwick

I am anti-expansion in general although I know that many are proposing to off-load this at Gatwick's feet and the Commission has only offered Heathrow or Gatwick as choices.

Gatwick is achievable as an option if transport links were improved- it is not too far to be a viable option. I am concerned by the effects of noise on those who are not currently affected. And on areas of woodland and natural beauty. It is possible that the economic benefits will be greater at Gatwick, as certain costs to the Heathrow options have not been taken in to account, such as emissions requirements and hidden economic impacts such as transport and housing.

In answer to your Question 2, regarding improvements and mitigation:

- Ban night flights.
- Have a regulatory body with teeth to impose more effective, heavier fiscally punitive measures on incursions by low-level take offs/ slow-climb-ups to save on fuel.
- Enforce fuel pricing at lower levels at Heathrow.
- Make the CAA answerable and more available to the public.
- Nationalise Heathrow and make it a true asset for Britain's economy.

No negative impacts can be mitigated adequately to meet the cost of loss of enjoyment of some of the most outstanding outdoor spots in Britain by increased blight of aircraft noise and intrusion.

(No mitigation can protect one's enjoyment of one's own garden from the onslaught of aircraft noise. No mitigation can give back lost sleep. No mitigation can help children play freely outside, at school- as evidenced by Heathrow's risible efforts to ensure Hounslow children get to play outside- by making them play inside a hut. No double-glazing can protect you when it's hot- or perhaps we should all get air-con and live in little boxes..)

Defficiencies of the process of Appraisal by the Commission- areas that need addressing:

Children

The omission of children from any of the attached reports is scandalous. Children are cited in various studies to be deeply affected by aircraft noise and obviously pollution.

Safety and Security

Safety impacts have not been adequately analysed. Accidents such as Staines in 1972, the 'near miss' in 2008 by Boeing 777, BA Flight 308 feet away from the perimeter boundary after the plane lost power on descent, are frightening reminders of what might happen with more air traffic in our increasingly crowded skies. The airspace above Greater London air serves more passengers than anywhere else in the world. (A record 144.7m passengers flew through London's five commercial airports in 2014. Source: Independent 23rd Jan 2015.) Similar crashes at San Francisco (2013) and Schiphol (2009) give a salutary message to be cautious with expanding over residential areas.

Breaches of security are a great worry when considering the heightened state of alert that we've been in for the last few years. The proposal to expand over such densely populated areas,, seems to be toying with our future on a wing and a prayer. Every accident is a surprise, how can we prepare for one or pre-empt one effectively except consciously not adding to the volume of aircraft going over such a densely populated area. Concerns over the tunneling of the M25 under the proposed new runway at Heathrow regarding the possibility of a terrorist attack are well-founded since attack could cause maximum disruption to thousands of people.

Noise Measurement

Noise measurement used is inadequate. WHO methods should be used as noted before. Noise and health studies were inadequate. The impact on health was not covered in enough details. The effects on mental health and respiratory health should be investigated. Studies often cannot separate the effects of traffic from air craft pollution however the extra 25 million road journeys generated by a bigger Heathrow will be a significant contributor to pollution- and NO₂/ CO₂ emissions.

Flight Paths

Without the knowledge of which flight paths will be chosen we are in the dark as to knowing what the future holds for officially 750,000 people and 1 million people, in London, should WHO standards of noise measurement be adopted. Teddington appears to be a sacrificial lamb in this scenario, with 4 concentrated flight paths going over it. But how can we object when we do not know what the flight paths are going to be?

Inegalitarian

It has been a very inegalitarian process- no press were invited to the only public conference, events were not publicised, in spite of the heavily funded propaganda machine in support of all the proponents, the public were kept at arm's length. The way of taking part is quite legalistic and off-putting for many.

Things I feel that have not been addressed properly are:

- Interconnectivity between airports. Spreading the load adequately, maximizing existing capacity would be adequate in my view. Since we already are the world leader in terms of passenger numbers across London.
- Health of children as stated above.
- Noise measurement to allow for noise contour maps that recognized areas such as ours.

I have omitted some of the last questions as I have covered all my points above bar these:

Further Comments

The Back Heathrow campaign and Heathrow Limited have been extremely creative with the truth using dubious polls to garner supporter numbers and have spent an inordinate amount to get a PR message across instead of dealing with residents' complaints at all. Even the Heathrow Community Liaison team were feeding negative information to the media to further the ambitions for a third runway- a battle that the ordinary person could not possibly win. I would argue that some of those messages were worthy of an Advertising Standards Complaint and were also undermining of the public nature of this consultation. The lack of transparency regarding the funding involved in the Back Heathrow campaign was significant as this was designed to put residents on the back foot.

