Hever Parish Council

1st February 2015

Hever Parish Council's submission to the Airports Commission Consultation on the shortlisted options for an extra runway in South East England.

The following submission represents the response of Hever Parish Council to the Airports Commission Consultation.

Q1. What conclusions, if any, do you draw in respect of the three short-listed options? In answering this question please take into account the Commission's consultation documents and any other information you consider relevant.

Conclusion 1

Demand is greatest at Heathrow

The key conclusion that we draw from the three proposals is that there is not the required demand from airlines to use Gatwick that would justify its expansion. The chair of the Commission has stated that Stanstead Airport was not included in the short list for expansion because the Commission followed "the market" (Today programme, Radio 4, 17th December 2014), i.e. demand is higher at Heathrow and Gatwick than Stanstead and so they should be considered for expansion before Stanstead. Continuing with this theme Heathrow is clearly in greater demand than Gatwick (it is 99% full v Gatwick's 85%, Source: Airports Commission) and, thus, should be expanded ahead of Gatwick.

Conclusion 2

Expanding Gatwick will make it less attractive to airlines

The Airports Commission estimates that the cost of building a new Gatwick runway would be up to £9.3 billion.[i] That is higher than Gatwick Airport Limited's (GAL) estimate of £7.4 billion.

In order to pay the cost of a second runway, the Commission states that passenger charges would rise from £9 at present to "between £15 and £18, with peak charges up to £23."[ii] That is an average extra charge per return flight of £12 - £28 per head. We note that the Commission has not taken into account that this might cause some airlines that currently use Gatwick to move to other airports.[iii]

Conclusion 3

Economic benefit

Of the shortlisted options it is clear from the Commission's work that either option at Heathrow would give the UK far greater economic benefit. If the decision on expansion is to be market and economy led then either of the Heathrow options would be better than expanding Gatwick.

Conclusion 4

Lack of long-haul connectivity

We note that in most future scenarios explored by the Commission, 'Gatwick [with a new runway] remains mainly focused on the short-haul market …'[iv] Given that the "capacity crunch" which needs remedying concerns long-haul connectivity to emerging market destinations Gatwick does not, according to the Commission's own analysis, provide a solution and so should not be expanded.

Conclusion 5

Gatwick takes longer to get to than Heathrow

Gatwick's location to the south of London means that only 35% of the UK's population is within two hours travel time of it compared to 70% for Heathrow. Simple ease of access for a great many people is better served by expanding Heathrow instead of Gatwick.

Conclusion 6

Gatwick's surface access proposals are inadequate

It is clearly not possible to serve an expanded Gatwick without significant additional surface access infrastructure being put in place. Much of the required additional investment, especially with regard to the M23, has not been costed-in to Gatwick's proposal meaning its true financial cost is unknown. Furthermore, the likely extent of the extra infrastructure required would necessitate financial support from the UK government – contrary to the statements on this issue from GAL.

Q2. Do you have any suggestions for how the short-listed options could be improved, i.e. their benefits enhanced or negative impacts mitigated? The options and their impacts are summarised in Section 3 of the Consultation Document.

Maximum Respite: Advocating the introduction of a policy that offers maximum respite for all communities and individuals affected, and is based upon geography rather than size of population. It should include:

- The provision of a **programme of planned rolling respite** for all blighted communities
    - The abandonment of the current policy, which unfairly targets rural areas, areas of tranquillity and areas of low-density population by concentrating flight paths over them.

Maximum Safe Height: Advocating the introduction of a regulatory discipline to control noise and disturbance. This should include:

- minimum height restrictions for aircraft preparing to land.
- significant and effective financial penalties for noise-related incidents, so that unnecessary noise from low flying aircraft is reduced to a minimum.

Noise Measuring: Advocating the adoption of noise measurement standards to replace noise averaging (as represented by the current use of the 57dBLAeq yardstick), so as to reflect better the actual impact of individual noise events. The assessment of impact would be based upon the latest technical opinion on Noise Disturbance and its correlation with health issues. This, along with the use of more meters, would make noise reduction targets more realistic.

No Night Flights: The cessation of all night flights between the hours of midnight and 6.00 a.m., in order to eliminate the most disturbing aircraft noise for the benefit of our communities.

Aircraft modification: Advocate a national policy within the United Kingdom whereby all the Airbus A318, A319, A320 and A321 aircraft, and those with a similar airframe, which call at UK airports, are to be retrospectively fitted with a modification to reduce FOPP cavities and similar aircraft noise.

Noise monitoring, enforcement and consultation:

We are **in favour** of the following technical improvements to the consultation, implementation, monitoring and enforcement regimes:

- **revision of the terms of reference and management** of Airport Consultative Committees to make them independent, representative, transparent and effective.

the establishment of an Independent Authority to oversee the management and delivery of Noise Action Plans and Airport Master Plans, with effective powers of enforcement.

Q3. Do you have any comments on how the Commission has carried out its appraisal? The appraisal process is summarised in Section 2 of the Consultation Document.

No.

Q4. In your view, are there any relevant factors that have not been fully addressed by the Commission to date?

New flight paths. The Commission has published a map of the new flight paths with a new runway at Gatwick Airport. They emphasise that this is only illustrative and does not represent where the routes might actually be. One of the basic flaws of airport planning, in Britain and other countries, is that the actual flight paths are only decided after permission is given to expand an airport, causing many people to feel misled and aggrieved. Residents currently feel extremely aggrieved at the lack of consultation about new air traffic control procedures at GAL.

Negative impact on AONB. The statutory requirement to take account of the AONB designation has not been factored in to the indicative flight paths being considered by the Commission. Gatwick is surrounded on three sides by Areas of Outstanding Natural Beauty – the High Weald AONB and the Surrey Hills AONB – each visited by over a million people each year who are in search of peace and tranquillity. National government and local councils have a statutory duty to conserve and enhance the natural beauty of these areas, and this applies to any decisions they may take, not merely to planning applications.

No provision for respite under GAL's proposals

Gatwick with two runways is planned to handle 560,000 air traffic movements a year, compared to 250,000 a year at present. Currently, aircraft take-off or land at a rate of nearly one a minute. With a new runway it would be nearly two a minute. We would remind the Commission that with both runways handling arrivals and departures, there could be no scheme to provide respite by alternating the use of the runways, as at Heathrow.

Effect of noise caused by Gatwick expansion underestimated

When account is taken of background noise levels it can be shown that the difference in the level of disturbance at Gatwick compared to Heathrow would be much less marked than shown in the usual simplistic Leq figures. Leq measures noise but does not measure the LMax annoyance impact. The International Standards Organisation recommends a 10dB difference in the assessment of noise in rural areas compared to urban residential areas, to allow for the difference in background noise levels. At Gatwick, with a second runway, 13,200 people would fall within the 57 Leq contour. If they were all living in a rural area as GAL suggest, then the 57 Leq contour would be equivalent to the 67 Leq contour at Heathrow – which has 9,500 currently living within it.

Night flights and the effect of sleep deprivation. The LMax of flights coming over the High Weald between 2500 and 3500 feet is 90db. The LMax of 90 db is enough to wake even the deepest sleeper. Long term sleep deprivation reduces life expectancy according to the World Health Organisation. It is a key difference between the Heathrow options and Gatwick. Heathrow accepts a quota of 3500 night flights; the current Commission assumption is a Gatwick quota of 11800. Heathrow puts the majority of night flights before 11.30pm and after 6.30am. Gatwick night flights arrive all through the night. The charging regime at Gatwick encourages night flights during the summer months, off peak landing charges are levied in peak season and there is no overnight parking charge for aircraft. We

see no examination of this key difference between the bids in terms of negative impact on health and well-being. The Commission seems preoccupied with a numerical analysis of the noise issues rather than a qualitative one in which ambient noise, LMax and the effect on quality of life are also considered. Given the CAA paper on night noise and the effects the Commission should have access to data from the noise meter at Bidborough and Hever Castle to establish true noise impact in the High Weald. (Please see comment on the interpretation of data from the meter at Hever Castle later below).

Reputation. We also wish to comment on the reputation of the proposer in the case of Gatwick. Hever Parish Council feels that what the Commission will recommend amounts to an asset of national significance. It should be managed as such. Global Infrastructure Partners have already indicated they will divest themselves of GAL in 2019. The current management has made a number of pledges none of which will be worth anything if there is a change of ownership. It is a risk that has not been considered. It undermines the validity of the undertakings made by GAL in their proposal and reduces our confidence in the business case and sustainability assessment.

The High Weald Councils Aviation Action Group, of which Hever Parish Council is a member, has tried to engage constructively with GAL with regard to their plans for the airport and the airspace around it. At each stage it has been met by obfuscation and denial. All of the issues that affect our residents, which have been denied as existing by GAL, have turned out to be true.

When GAL has placed a noise meter within our parish (at Hever Castle) the results which GAL has produced from this meter after interpreting the data it collected have been manipulated so that they indicate a level of noise that is not the experience of residents. GAL did this by averaging all the noise created by aircraft flying over Hever Castle en route to Gatwick during the period being measured – including the days when no aircraft overflew Hever Castle (when Runway 08 rather than Runway 26 was in use) . This is disingenuous at best and dishonest and at worse. Such behaviour should not be ignored by the Commission.

Throughout its process the Commission has taken a utilitarian view of the benefits of extra capacity in relation to national economic life and social impact. The opportunity for the public to engage with the airport, specifically at Gatwick, to shape the scheme has been negligible. The enactment of corporate responsibility of the proposers should form part of the Commission's judgement. In the case of GAL the Gatwick second runway consultation conducted by the airport was contemptuous of the local communities that will be some of the most impacted. There were three versions of the scheme presented locally, but it appears that GAL never intended to take any account of local opinion in the design of the scheme or subsequent alterations; indeed the final proposal was not any of the three presented nor carried any of the local recommendations.

We ask that the behaviour of GAL towards its neighbouring communities, corporate responsibility and reputation are addressed.

Q5. Do you have any comments on how the Commission has carried out its appraisal of specific topics (as defined by the Commission's 16 appraisal modules), including methodology and results?

No.

Q6. Do you have any comments on the Commission's sustainability assessments, including methodology and results?

Noise. Hever Parish Council has a number of concerns related to using data provided by the CAA which mean that the Commission is missing some important aspects in the sustainability assessment of impact of noise.

Aircraft Noise Certification. When airports and airlines have enquiries from members of the public over aircraft noise they are often advised that the investigation has found the aircraft concerned was operating within the permitted rules. There are few rules and no UK statutory laws covering aircraft noise. Aircraft have to operate within International Civil Aviation Organisation (ICAO) noise energy standards which are awarded when a new aircraft receives certification. In modern aircraft that is at Chapter 4 standards. Earlier and noisier aircraft would be in Chapters 1, 2, or 3. To determine sound energy emissions for certification noise is measured at three points around a runway: Fly-over - 6.5kms from brake release point, under take-off path; Sideline - the highest noise measurement at any point from 450m from the runway axis during take-off; Approach – 2km from the runway threshold, under the approach flight-path. What is not measured is the pitch or frequency of the sound emissions. The Commission should include pitch and frequency considerations of noise impact.

Airbus A318/A319/A320/A321 Airframe Whine. For residents living under the long low flight path for aircraft arriving at Gatwick there is a high pitched whine to contend with, emitted by the Airbus A318/A319/A320/A321 series of aircraft. High pitched frequencies are not recorded in sound energy measurement for certification of aircraft nor are they measured by the ANCON 57dB LAeq contours but they affect people's lives day and night up to 25 miles from airports along the arrival flight path. Although this nuisance was known to the CAA as long ago as 2005 they only finally admitted to this fact on 16 October 2013 when it confirmed that the noise was emitted around Hz500-600 which is at the peak sensitivity of human hearing and therefore very noticeable. At night time over 70% of all flight arrivals are of the Airbus A320 series type and nearly all owned by EasyJet. Throughout the day these aircraft interfere with the public's enjoyment of the High Weald, a recognised Area of Outstanding Natural Beauty and many internationally recognised cultural and historic tourist attractions such as Penshurst Place, Chiddingstone Castle and Hever Castle. At night the debilitating whine is constantly interfering with people's sleep patterns which should give Government, the CAA, airport and airline operators as well as the Commission greater concern for individuals' well-being and long term health issues than is currently in the Commission documents. The causes of this nuisance are cavities on the wings which allow air to resonate at a high frequency. A modification is available known as a vortex generator which cancels out this nuisance. It is a simple piece of aluminium and made in the United Kingdom. Lufthansa and Air France have already fitted out their fleets with the retro fit; Hever Parish Council asks that the Commission should recommend that all UK Fleets are required to do the same.

Measurement of Aircraft Noise around Airports. For measuring nuisance for residents living around airports, an old and unscientific (by contemporary standards) formula is used called ANCON 57dB LAeq contours. This discredited method, originally conceived on limited

research in the 1960s but tinkered with regularly since then, is used by the Civil Aviation Authority to measure sound contours around airports but based on a continuous 16 hour period. There are other methods over a night time period or 24 hour day but the 57dB LAeq is more commonly used. The formula suggests that people only become irritated by noise when it reaches 57 decibels on a continuous basis. This is palpably nonsense particularly in the countryside where the ambient noise level is recognised as being 10 decibels lower than in urban areas.

When we examine the contour maps drawn for each airport it becomes obvious how restrictive these measurements are for they will only extend 6 miles either end of a runway and less than ¾ mile in width from the projected centreline. This will then show that as far as Gatwick Airport is concerned people living only within a derisory 40.4km2 are affected by noise.

The reality is that the area around Gatwick Airport affected by decibels in excess of 57 dBs is at least 1172 km2 much of it across Areas of Outstanding Natural Beauty and encompassing many villages and towns, schools, hospitals and care homes. The CAA's report claiming fewer people are affected today by aircraft noise is incorrect. More people on a national and international level are being affected not just on increased flight movements but from the toxic mix of sound at excessive decibels and high frequency pitch airframe whine. It is disappointing that the aviation industry in justification of its operations quote ANCON contours as a mantra. The Commission should hold itself to a more scientific standard than the ancon metric. They were not scientifically established to protect people's health and well-being, they represent an arbitrary figure.

Place. There are 200,000 residents in the High Weald and 2 million visitors who will be directly affected by expansion at Gatwick who have not been considered by the Commission in either the business case or the sustainability assessment. Hever Castle last year had 276,000 visitors excluding children under 5. With weddings, theatre, private functions, children and corporates the CEO estimates over 300,000 people visit a year. Penshurst Place has 100,000 visitors; other important national heritage sites include Chiddingstone Castle and Groombridge Place, all directly under the westerly approach path. Ashdown Forest gets at least one million visitors, it is under both the current and the proposed flight paths yet it appears to be ignored in the sustainability assessment. It has important European and UK protected status.

The "catalytic" effect of expansion at Gatwick on the Communities, businesses and heritage in the High Weald should be incorporated into the Commission's work on Gatwick. It is notable by its absence. Such a narrow view of which businesses and communities are directly affected by the proposal undermines the credibility of the important work of the Commission.

Wellbeing. This response has made much of night flights and the effect of sleep disturbance which leads to sleep deprivation and to a considerable impact on well-being. The Commissions assertion para 15.2 of the GAL sustainability assessment is untrue.

Living in a night time aircraft noise contour was not associated with any effect on subjective wellbeing.

This view stands in direct contrast to the experience of residents within our Hever parish. Night flying is the activity our residents resent most and has the greatest negative impact on their subjective and objective well-being. Hever Parish Council wishes to draw the Commission's attention to the ERCD Report 1208 Aircraft Noise, Sleep Disturbance and Health Effects: A Review. The key findings were:

7.7 In conclusion, the following key findings must be considered when taking into account cost-benefit analysis of night flights:

- *The WHO recommends an interim limit of 55dB Lnight for the protection of residents against significant noise-induced adverse health effects.*

- *Percentage highly sleep disturbed (%HSD) can be used to monetise sleep disturbance based on night-time exposure, Lnight. This measure is taken from self-reported estimates of sleep disturbance.*

- *Levels above 55 dB Lnight result in increased risk of myocardial infarctions and these can be monetised using established methods.*

- *Levels above 45 dB Lnight result in increased risk of hypertension, and this can lead to hypertensive strokes and dementia, which can be monetised using established methods.*

The latest noise report published on behalf of GAL taken from readings at Hever dated 21 October 2014 concludes that the total night noise is 54dba. The report also notes that the Lmax is 89dba only one decibel short of what the CAA report says causes chronic illness if there is exposure to 25 events. The Hever report does not include Gatwick's busiest month in August.

These two reports prove that the High Weald, of which Hever is a part, is already at its threshold for noise pollution. To put more planes into Gatwick would cause significant health impacts which can be monetised according to the CAA report. Hever Parish Council request this impact is monetised and costed into the forecast.

Q7. Do you have any comments on the Commission's business cases, including methodology and results?

No.

Q8. Do you have any other comments?

Local stakeholder support. The Commission has noted with regard to the GAL second runway proposal:

Local stakeholder support: The Commission has noted mixed levels of support from local stakeholders for the proposed expansion. Some local government bodies have indicated opposition, while others have indicated potential support, contingent upon appropriate environmental mitigations.

Local stake holder support has proved subject to rapid change. Perceptions of the value of the GAL proposal have changed. GAL is not regarded as conducting itself in a manner consistent with corporate good practice. The change of perception occurred during consultation on the proposal and the consultation on airspace change. Opinion has polarised. The Commission should update its work on stakeholder support for the GAL proposal in time for the final report.

At a local level the predicted economic benefits would largely accrue to the additional labour force at the airport, in new jobs related to the airport or to the staff of new firms moving into the area. To the extent that the benefit would go mainly to people who move into the area, there will be few benefits to existing residents. There will be huge disbenefits for those living in affected areas such as Hever on which the Commission has not registered the true economic impact, i.e. the negative effect on the sustainability of Hever Caste as a tourist destination.

Residents are extremely concerned that the housing blight will extend far further that the Commission envisages. With a preponderance of large detached houses studies suggest that those who end up in the noise shadow of the flight paths will lose 30% of the equity in their houses as well as suffering the noise pollution. The true extent of the housing blight, the economic effect, and the impact on HMT revenue should be costed into the business case and sustainability assessment.

---

[i] Airports Commission Consultation Document November 2014 paragraphs 3.48 and 3.52
[ii] Airports Commission Consultation Document November 2014 paragraph 3.41
[iii] Airports Commission Consultation Document November 2014 paragraph 2.26
[iv] Airports Commission Consultation Document November 2014 paragraph 3.13