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Sir Howard Davies  
Airports Commission  
6<sup>th</sup> floor  
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20 Great Smith Street  
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By email: [noise.paper@airports.gsi.gov.uk](mailto:noise.paper@airports.gsi.gov.uk)

Dear Sir Howard Davies,

Thank-you for the opportunity to respond to the Airports Commission Aviation Noise Discussion Paper, the fifth document the Commission has produced to allow the public and stakeholders to influence the Commission's work. In responding on behalf of the London Assembly Labour Group I want to raise with you specific proposals, which, I feel, form an essential part of the debate surrounding how we tackle noise pollution. Following on from that I set out the group's general position structured around the chapters in the noise paper based on the extensive work done by the London Assembly in the last decade.

### **Tackling nuisance noise, time for a new approach**

As members of the London Assembly we are often the first elected politicians that Londoners will turn to raise concerns over aviation noise. The Labour Group's 12 members cover all four corners of the Capital and we are all fully aware of the distress noise causes communities as well as the detrimental impact it can have on quality of life. My view, which is shared by my colleagues, is that amongst the many twists and turns of the aviation debate, the concerns of Londoners around noise are too frequently dismissed or regarded as secondary to other issues.

The Mayor of London has comprehensively failed to get to grips with aviation noise. The principle producer of noise pollution is Heathrow Airport with 28% of all people in Europe affected by aircraft noise living under the Heathrow flight paths.<sup>1</sup> In the last decade the problem has spread across London with disturbance now being felt up to 20 km away from the airport.<sup>2</sup>

There are some parts of London that suffer noise disturbance from planes arriving and departing from London City Airport in addition to aircraft from Heathrow. This is not sustainable for a city

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<sup>1</sup> 'CAA Report: 28% of people in Europe affected by aircraft noise live under the Heathrow flight paths', HACAN press release, 21 December 2011: [http://www.hacan.org.uk/news/press\\_releases.php?id=282](http://www.hacan.org.uk/news/press_releases.php?id=282)

<sup>2</sup> [The London Assembly's consultation response to the Government's draft aviation policy framework, 31 October 2012, p.8](#)

that aspires to be, the best major city in the world to live in, as Mayor Boris Johnson set out in his recent 2020 Vision for the Capital.<sup>3</sup>

The response of Heathrow Airport to the concerns of Londoners has been as lacklustre as the Mayor's own response, leaving many wondering to whom they can turn to make change happen. Heathrow's mitigation scheme for affected residents is much less than that offered by London City Airport. Residents near Heathrow must wait for the noise to reach a higher decibel level than their counterparts near City Airport before they are even eligible for support. This assistance when it is provided can only ever mitigate, not eliminate, the noise distress which they experience every day of their lives.

With a vacuum of leadership and the Mayor doing very little to push BAA into providing better noise mitigation measures to those under Heathrow's flight path, I have set out a strong package of measures that could go a long way to alleviate the disturbance felt by Londoners. These measures have the full support of my colleagues on the Labour Group at the London Assembly.

The first step must be for the Mayor to re-establish the GLA noise team which was shut down when the Mayor came to office. The team would be able to undertake a comprehensive update of the Mayor's noise strategy which has not been revised in nine years. The noise strategy would act as the foundation for a tough set of guidelines setting out the mitigation measures that airports offer and seek to create a uniform standard of measures that all airport operators could adhere to.

The current self-regulation by the airports has failed Londoners. They have demonstrated their inability to restrain their commercial activities from having a detrimental impact on the quality of life of Londoners. The GLA noise team should become a statutory regulator of aviation noise mitigation schemes and act as a guarantor of the public interest.

I will now turn to some of the excellent analysis of this subject conducted by the Environment Committee in relation to the specific questions posed in the noise paper. The points raised (and sent under a separate cover as the Committee's own response) form the backbone to the position that I have set out.

### **Chapter 3: Measuring aviation noise**

The committee has previously recommended<sup>4</sup> the adoption of an Lden measure and the use of lower thresholds for identifying the areas most affected by aircraft noise. This was driven by the greater effects of noise on people in the evening, night and early morning, when there is less other noise and people are trying to sleep. It was also informed by the Lden threshold used by the EU, and recent evidence on the levels of noise causing serious and moderate annoyance. The committee has not taken evidence on metrics such as the number of noise events above a threshold, but would generally support metrics and thresholds that effectively reflect the human impact of aircraft noise and that work with other relevant regulatory frameworks to minimise noise disturbance for Londoners.

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<sup>3</sup> [The Mayor's 2020 Vision p.8](#)

<sup>4</sup> *Flights of Fancy* pages 16-21, *Plane Speaking* pages 32-34, APF response pages 9-10

The committee would welcome the Airport Commission making a contribution to the debate over noise metrics, informed by current research and the views of those affected by noise. The Committee did not feel that the government's response to the recent consultation on the aviation policy framework adequately reflected the submissions it had received, and wrote to the Department for Transport on the issue.<sup>5</sup>

A further point that the committee has made on noise metrics is that airports should not be considered in isolation. There are parts of London which experience sub-threshold noise from more than one airport (especially noise from Heathrow and City in south-east London) which combines to create greater noise impact that would be expected from either alone. The committee has recommended that Heathrow and City work together to manage their joint noise impacts and that a combined noise map for the two airports be constructed and used to regulate noise from both.<sup>6</sup>

This and the next chapter of the issues paper raise related questions about whether noise metrics should consider absolute noise levels or the change to existing noise levels, and whether there is a difference between affecting a new area with noise versus increasing noise in an already-affected area.

The Committee recommends that the human effects of noise are considered – both the number of people affected and the severity of the effect on those people. London's experience with increasing aircraft numbers and changing flight paths and hours of operation is that the negative impacts of increased noise can be considerable even in an area already experiencing a lesser level of noise from aviation or other sources. The paper shows that noise from Heathrow affects by far the most people of any airport in the UK or Europe, and by far the most people per aircraft and per passenger of any airport in the UK. If more passengers are to fly to and from airports in the south-east it should be at airports with the lowest impacts per extra passenger.

## **Chapter 4: Quantifying noise effects**

In responding to the recent night noise consultation, this committee found that the Civil Aviation Authority's current approach only partly reflected the available evidence on the cost of sleep disturbance from aircraft noise. Responding within the terms of the consultation, the committee did not consider whether monetisation was the right way to quantify the effects of noise, but did conclude that if monetisation was used then it should reflect best available estimates of all costs, rather than treating costs of uncertain magnitude as zero. The committee also recommended that further research be undertaken to arrive at better estimates of costs, where current evidence was that there were potentially significant effects.<sup>7</sup> The committee previously recommended that

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<sup>5</sup> <http://www.london.gov.uk/mayor-assembly/london-assembly/publications/letter-to-transport-secretary-on-the-aviation-policy-framework>

<sup>6</sup> *Plane Speaking* pages 34 and 36-37, APF response page 10

<sup>7</sup> Night Noise response section 9

there should be a full and independent health impact assessment around aviation noise and air pollution, particularly for London.<sup>8</sup>

## **Chapter 5: Mitigation**

As a triggering threshold for its compensation scheme, the committee recommended that Heathrow adopt the 59dB Lden contour, in line with London City airport's 57dB LAeq threshold and with the committee's recommendation for a switch from LAeq to Lden. The committee also looked forward to Heathrow and City both developing tighter thresholds in line with EU Noise Directive requirements and recent research for the UK government and the World Health Organisation.<sup>9</sup>

This chapter also seeks views on an independent noise regulator. The committee has drawn attention to the range of models for independent regulation of aviation and its impacts, either proposed within the UK or in practice overseas. The committee has not recommended a specific model but has drawn attention to the need for a single point of reference to simplify the regulatory environment and for a trusted third party to reduce antagonism in the relationship between communities and airports.<sup>10</sup> As discussed earlier in this response, I am suggesting, on behalf of my colleagues in the Labour Group, a policy which takes the committee's conclusions to the next logical step, with the proposal to establish a statutory regulator from a re-formed GLA noise team. It is only through radical measures like this that communities in London can have confidence that their concerns are being listened to and acted on.

## **Other aviation issues**

The committee has highlighted a number of additional points which relate to the broader work of the Airports Commission that you may be able to consider.

### *Carbon emissions*

This committee has heard from the Committee on Climate Change that accommodating a 'business as usual' projected growth in passenger numbers (200 per cent) would not be consistent with reducing UK carbon emissions by 80 per cent by 2050, as required by the Climate Change Act 2008. Even to accommodate a more restricted (60 per cent) growth in passenger numbers would mean that, despite more efficient aircraft, aviation CO<sub>2</sub> emissions would not decrease and would therefore require greater decarbonisation in other areas of the economy than is indicated by current progress.

Airport strategy should be based around an overall UK quantum of aviation consistent with the 80 per cent reduction and with realistic expectations of decarbonisation in other sectors.

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<sup>8</sup> *Flights of Fancy* pages 26-28, *Plane Speaking* pages 36-37

<sup>9</sup> *Plane Speaking* pages 34-37, APF response pages 10-11, Night Noise response section 8

<sup>10</sup> *Flights of Fancy* page 35, APF response pages 12-13

Decisions can then be made about where to locate that capacity, in the light of local considerations including noise as discussed above, and air pollution below.<sup>11</sup>

### *Air pollution*

Air pollution is a major public health issue, with 29,000 excess deaths each year estimated to be attributable to particulates exposure nationwide. There are persistent breaches of EU and national NO<sub>2</sub> limit values around Heathrow and its approach roads, far more so than in other areas of outer London. National, London and local government face a great challenge in bringing these levels down even at current Heathrow passenger numbers so any expansion would be a significant negative factor. As a major driver of breaches in the areas around Heathrow is surface access, passenger numbers and modes of surface travel are critical factors, as much as the number and type of aircraft using the airport.<sup>12</sup>

### *High Speed Two*

The committee's response to High Speed Two Ltd's consultation on its draft Environmental Statement<sup>13</sup> noted that decisions on the HS2 scheme are expected to be taken before the Airports Commission is due to make its final report. It could be unfortunate, either if the HS2 route was influenced by false expectations about the future expansion of Heathrow, or if the planned HS2 route contributed to a decision to expand Heathrow in the face of all the negative impacts that would bring. If the Commission is not minded to recommend the expansion of Heathrow, an early indication of this would be helpful to inform other strategic infrastructure decisions.

## **Conclusion**

The work of the Airports Commission is arguably one of the most significant national enquiries into infrastructure commissioned by the government in recent decades. This is the best opportunity Londoners have had for many years to put their concerns on aviation noise to decision makers. It is critical that noise disturbance and the lack of effective mitigation measures against it are uppermost in the mind of the Commission.

I believe the bold set of measures outlined here could make a real difference to the lives of millions of Londoners. Mayoral indifference coupled with the ineffective actions of the airport operators have left Londoners frustrated and disenchanted with political process. The final report of the Commission must go some way to bridge that gap.

Noise, as well as other environmental factors clearly swings the debate about airport capacity against any expansion of Heathrow. The London Assembly unanimously opposes Heathrow expansion in terms of either runway capacity or passenger numbers, and has called for the final

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<sup>11</sup> *Flights of Fancy* pages 29-34 especially page 30, APF response pages 5-7

<sup>12</sup> *Flights of Fancy* pages 22-28, *Plane Speaking* pages 17-30

<sup>13</sup> <http://www.london.gov.uk/mayor-assembly/london-assembly/publications/high-speed-2-response-to-draft-environment-statement> - see section 6, especially paragraphs 6.8 – 6.10

report from the Airports Commission before the next general election.<sup>14</sup> Put simply, Londoners cannot be expected to tolerate the aviation noise that blights communities on a daily basis for a moment longer.

If you would like any further information on our submission, or would like to discuss the matters raised, please don't hesitate to contact my office at the contact details above.

Yours sincerely,



**Murad Qureshi AM**

On behalf of the London Assembly Labour Group

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<sup>14</sup> <http://www.london.gov.uk/media/assembly-press-releases/2012/07/assembly-says-no-to-revival-of-third-runway-at-heathrow> ;  
<http://www.london.gov.uk/media/assembly-press-releases/2012/10/bring-forward-publication-of-airport-capacity-report-assembly> ;  
<http://www.london.gov.uk/mayor-assembly/london-assembly/publications/airport-capacity-in-london> ;  
<http://www.london.gov.uk/media/assembly-press-releases/2013/05/london-assembly-restates-opposition-to-extra-runways-at-heathrow>