

## **Blackheath Society**

### **Response to Aviation Noise Discussion Paper**

I am writing on behalf of the Blackheath Society in response to the above Paper issued by the Davies Commission

The Blackheath Society was founded in 1937. It has about 800 members. Its aims are to preserve and enhance for the benefit of the public the features of Blackheath which are of particular beauty or interest, and generally to protect the local environment.

#### **Chapter 2 – Impact of Aircraft Noise**

The Society has taken a particular interest in the effects of aircraft noise on Blackheath and its residents since the mid-1990's when, for the first time, the point at which aircraft descending towards Heathrow in a westerly direction joined the glide path, was extended so far eastwards that aircraft approaching from the north and the south (after leaving their stacks) turned to join the glidepath over or very close to Blackheath. When the wind is from a westerly direction, which is for about 70% of the time, aircraft are turning over Blackheath at between 4 and 5,000 feet at about 90 second intervals. The position is exacerbated by the presence of City Airport just to the North. When the wind is from the East aircraft flying into City Airport frequently fly over Blackheath on their final approach, usually at about 2,000 feet.

An example of a particular source of complaints is the very disturbing “whine” which emanates from the Airbus A320 family in the intermediate approach phase. According to the CAA, ICAO were at one stage reviewing the noise certification process for this aircraft but this work was discontinued because the aircraft industry did not want it.

Local residents find the night flights into Heathrow particularly troublesome. At any time after 4.30 am they are likely to be woken up by the noise of incoming aircraft, and after 6.00am the noise is continuous and deafening. A common complaint from residents is that, once woken up, they find it difficult to get back to sleep again, with the consequent adverse effect on performance the next day.

The fact that disturbance from aircraft noise extends well beyond the 57 dbA Leq contour is apparent from the charts shewing the geographical spread of complaints, including from this area, about aircraft noise made by members of the public to Heathrow or BAA. We would also refer to the recent Early Morning Respite Trials extending over 5 months carried out by Heathrow over areas of London outside the 57 contour line and extending to the east as far as this area. We comment on these trials under Chapter 5. Although the trials were not well planned and were inconclusive, what is clear is that Heathrow would

not have planned and undertaken these respite trials in conjunction with NATS and HACAN unless they had thought that the residents living in the areas affected by the trials needed respite from aircraft noise.

There have also been increasing problems with helicopter noise. Apart from the helicopters used by the police and the military, there are increasing numbers of helicopters used for private or sight-seeing purposes. Some of these come from Biggin Hill Airport and fly over Blackheath en route to the Thames. It now appears that Battersea Heliport will be used for similar purposes. The noise from a helicopter is louder and much more disturbing than from an aircraft, and they fly at a lower altitude. Despite concerns having been expressed over the last few years to Government and to the Greater London Authority about helicopter noise, little or nothing has been done to deal with this growing problem.

It is not unusual in this area to see (and hear) 3 or 4 aircraft in the sky at any one time: one disappearing towards Heathrow, one overhead, and another approaching and a fourth coming into or leaving City, with some helicopter noise thrown in. Local residents sometimes feel that they are living under the aviation equivalent of Piccadilly Circus.

### **Chapter 3 - Metrics**

In our view there are serious difficulties with the use of the current 57dbALeq Contour. It is important to use a metric which the general public can understand and can relate to. Administrators and regulators need to understand aggregated effects which the LAeq sound level contours provide. However most London residents are interested in how they are affected as individuals. The 57dbALeq Contour does not provide this. The noise is averaged out and so does not reflect what people actually hear or how or when they are disturbed. It does not give proper weight to the number of planes flying overhead, and the disturbance every 90 seconds or so which this will cause. It is this latter aspect which causes serious annoyance to local residents. Finally the contour only includes areas about 8.5 miles from Heathrow, and ignores the fact that aircraft noise has become a real problem in recent years for those who live 20 miles or more from Heathrow, including residents of Blackheath.

If LAeq metrics are to be used at all, at least they should accord with the WHO recommendations, which is that the onset of moderate community annoyance starts at 50 decibels and severe annoyance at 55.

There are so many deficiencies surrounding the use of the 57dbALeq Contour, that it is difficult to see how it can continue to be used as the basis for formulating important aviation decisions.

One metric not mentioned, which would be a considerable improvement on the N70 metric, are Sound Level Event Histograms. These show, not aggregated results, but most

of what residents are interested in, namely how they are affected as individuals. Examples are annexed to this response. They are measuring noise using Lmax dbA at a point about 2 miles to the west of the Heathrow northern runway over an evening period. They show not just dbA values over 70, but the frequency figures in bands from 50 to 80. The second example uses the same data, but shown cumulatively. These metrics provide much more useful information to the average citizen and in an easy to understand format.

Our understanding is that the use of these histograms was recommended in the BAA 2011 Noise Metric Study, and that Heathrow currently uses these metrics in its Community Noise Reports.

On the question of whether a noise assessment should be based on absolute noise levels, or on changes to the existing noise environment, we would favour the former for two reasons. Firstly it is perfectly true that some people may not notice a new noise unless it exceeds the background noise. However others may. Secondly if the baseline is to be the existing noise environment, there may be a temptation to include existing aircraft noise. This may lead to a conclusion being drawn that it is better to inflict any increase in aircraft noise on those who already suffer from it and, it would be argued, have got used to it, rather than inflicting it on those who suffer no aircraft noise already. This approach seems to us to be particularly unfair and divisive. It will lead inevitably to the creation of noise ghettos.

## **Chapter 4 – Quantifying noise effects**

### Night Flights

The aircraft noise which concerns people the most are from night flights. The reasons why this is so are well documented. The concerns in this part of London are very considerable, as incoming aircraft start coming overhead from about 4.30 am, and from 6.00 to 7.00 am there are aircraft overhead about every 90 seconds. This Society has responded to the first Night Flight Consultation by the DfT, and will be responding to the second later in the year. In brief, this Society believes that the Government should be moving quickly towards abolishing all night flights. However in the interim it should prohibit all night flights between 11.30 pm and 6.00 am, so as to afford Londoners a reasonable period when they can sleep undisturbed by aircraft noise.

### Early Morning Respite Trials

There has recently been some publicity about the Early Morning Respite Trials carried out by Heathrow between November of last year and March this year. These trials were co-sponsored by HACAN. This Society had considerable discussion with HACAN during the trials, since it was obvious that the planning for the trials had been faulty. Without going into details, the plan was that an area within 2 parallel boxes, 2 within an inner zone and two within an outer zone, were to be avoided by incoming aircraft, the boxes in the inner zone one week, and those in the outer zone the next week. However no instructions were given as to where the aircraft should fly once they had avoided which

ever pair of boxes were active on any particular week. In fact what happened with most of the aircraft coming in from the east was that they flew in along an extended centreline between the two boxes (Blackheath is between the 2 outer boxes), thus adding to the number of night flights over an already busy area.

At a meeting in New Cross with Matt Gorman of Heathrow and John Stewart of HACAN held in March of this year, which the Society attended, it was accepted by Heathrow that the trials had not been properly thought through, and that, as a result, there had been unforeseen consequences. It was also accepted by Heathrow that these particular trials would not be repeated, and that before any further trials of this kind were attempted, there would be prior consultation with the communities likely to be affected.

The Society has no objection to trials being conducted with the aim of providing respite from aircraft noise. However the trials must be properly planned and there must be proper prior consultation with the communities likely to be affected, that is with those who will be enjoying respite and those who will be suffering the increased traffic.

#### Monetising Noise Impacts

We have grave reservations about this exercise and where it is leading. It has not proved to be possible to monetise all noise effects on health. For instance it seems to be well established that undue noise can result in cognitive impairment in children. One might have thought that this was an extremely serious matter. Those involved in trying to monetise such matters have been, no doubt to their regret, unable to do so. Others might think that trying to monetise such serious afflictions to health is, in this context at least, entirely inappropriate and certain value judgements should come into play if we are a civilized society. Finally having attempted to monetise these health impairments, what is the other side of the equation? Is it the loss to the aircraft industry if a third runway at Heathrow cannot be built? Are not these two matters incommensurable in statistical terms?

### **Chapter 5 - Mitigation**

#### Dispersal v Concentration

There is considerable scope, and strong arguments, for using dispersal much more extensively for arrivals into Heathrow. Air Traffic Control practice requires that there is concentration of inbound flights from 7.5 nm during the day and 10nm at night. However when concentration moves out to a point 15 to 20 nm from touch down along the extended centreline, incoming traffic is being concentrated when it could be dispersed, thus creating unnecessarily extended noise ghettos. In practice some dispersal already takes place, but there is scope for extending it considerably, by varying the routes in to the centreline or by the use of offset approaches. FMS technology will now make this much easier to achieve from the operational point of view.

Most people would agree that 40 planes an hour overhead is verging on the intolerable. If this could be reduced to 4 an hour by dispersal, this would be much more acceptable. It

is also more equitable to share noise in this way, rather than unnecessarily concentrating the noise over a smaller area and a smaller number of unfortunate residents.

This solution appeared to work well in the case of Sydney Airport.

Noise Envelopes

It is difficult to comment on this proposal without knowing precisely how it will work.

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on behalf of the Blackheath Society

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