

## RESPONSE TO GOVERNMENT AVIATION NOISE DISCUSSION PAPER

### 57 decibel noise contour

This seems to be the key to the whole issue. There is widespread evidence that people's threshold of annoyance is below the 57dB<sub>L<sub>Aeq</sub>16h</sub> (57 decibel level). This is supported not only by numerous surveys but also by the World Health Organisation. By maintaining the 57 decibel criterion there are far fewer people allegedly affected by excessive noise. For example this would mean that residents of Putney, Fulham and Ealing are technically not disturbed by excessive aircraft noise. This skews the economics and makes it appear that far fewer people will suffer serious annoyance from noise.

Without actually disagreeing with this contention, the government states that it does not intend to move the threshold downwards. According to the DOT Hartley McMaster report "there is overwhelming evidence from formal research, practice in other countries, the number of complaints regarding noise, and other anecdotal opinion, that change to a lower level and/or different widely accepted means of measurement, is now appropriate". Also "The 57 dB <sub>L<sub>Aeq</sub>, 16h</sub> contour is the wrong means of measurement because it is out-dated / represents an average / is ineffective.

In summary, there is no confidence in this contour as the (sole) basis for taking decisions regarding aviation noise." Though it does to some extent capture the number of events, it gives undue weight to the noise of individual aircraft and not enough to the number of planes. Thus, for example, it maintains that the noise annoyance of 1 Concorde every 4 hours is the same as 3 hrs 50 minutes of 757s flying over at 2-minute intervals. Neither does it measure the existence or otherwise of periods of tranquillity, which we all of us need from time to time. What matters is both the frequency (i.e. number) of flights and the intensity of the sound.

The government's justification for sticking to the current/historic 57 dB <sub>L<sub>Aeq</sub>, 16h</sub> level is that it enables them to monitor progress over time and that to change it would cause confusion. Surely the most important task is to find the right up to date tool for measuring the way noise affects people today – as opposed to making academic comparisons according to criteria that are no longer appropriate? Refusing to update the criteria now would be the same as refusing ever to update the constituents of the cost of living index; or measuring current satisfaction with the NHS on the basis of expectations fifty years ago.

In the DOT report compiled by Hartley McMaster Ltd. the question on noise and the 57 decibel threshold attracted more responses than any other. The majority in favour of a reduction was very large, and if you divide the respondents into individuals and business bodies (including the airports themselves), the majority of individuals in favour of a reduction was overwhelming whilst commercial organisations wanted to keep things as they are now (for obvious commercial reasons). In other words those actual 'human beings' affected by noise object to it, whilst those ('impersonal' organisations, such as airport authorities) who profit from it do not want to be restricted by such considerations. Thus when the government says that any airport can **choose** to produce surveys or operate at a lower decibel level, you have to ask yourself "why would they?

### Number of people affected

In para 1.3 it is stated that the government wants to reduce the number of people significantly affected by noise nuisance. But the table 2.2 shows that even at the 'outdated' 57 decibel level the numbers affected at Heathrow amount to 258,000 compared to 3,700 at Gatwick, 2,400 at Luton and 1,900 at Stanstead. Thus isn't the choice obvious?

One result of this is that the ratio of air traffic movements (ATMs) achieved as a ratio of people affected on the ground is nearly 50 times superior at Stanstead and nearly 40 times superior at Gatwick. 'Thus isn't the choice obvious?'

It is also interesting to note that at 55 decibel level the numbers affected at Heathrow are 725,000, compared to Frankfurt (238,000), Ch. De Gaulle (170,000) and Amsterdam (43,700). Thus any suggestion that the inhabitants of West London are somehow or another more selfish or particular is not warranted.

### Future further expansion

It appears there is no limit to BAA's ambitions for further expansion. It is of no comfort to be told that they would not apply for it before 2040, but would they actually refuse it if the pressure came from elsewhere?! They have provided too many assurances in the past, which have turned out to be worthless. In any event, we do not want a fourth runway at any time in the future.

Since demand will continue to grow it is clear it would be better to visualise this now and go for the long-term solution. Every time this comes up people say the situation is too pressing and that the construction of a super new airport would take too long. We stagger from one sub-optimal solution to another with endless enquiries and general

### Generation of jobs

Those in favour of expansion at Heathrow state that it will create 150,000 jobs. But jobs will be created wherever the expansion takes place or new airport is built, but far more people would be affected by noise with an expanded Heathrow than at alternative sites.

### Monetisation

How do you put a price on being able to sit in your garden or go for a walk in relative peace? I'm unsure that it is appropriate or even possible to put a monetary value on quality of life issues. Perhaps you should actually ask people the annual sum they would accept in return for agreeing to a third runway and additional flights? The report says that property prices tend to be lower in airport-noise affected areas. Without wanting to call the surveys referred to into question, house prices in Richmond, for example, don't appear to support this contention.

### Noise insulation

Yes, of course noise insulation helps with noise (but not with vibration) so long as you have all the windows closed. But it's a bit like offering gas masks to people living near a sewage farm. In any

event noise insulation is of no use whatsoever when you are outside and isn't it is a pretty fundamental freedom to be able to sit in your garden or go for a walk in relative peace?