

Airports Commission,  
6<sup>th</sup> Floor, Sanctuary Buildings,  
20 Great Smith Street,  
LONDON SW1P 3BT

19<sup>th</sup> September 2013

Dear Sir/Madam,

**RESPONSE TO THE AVIATION NOISE DISCUSSION PAPER**

Here, as requested is my redacted contribution to the Consultation following my contribution of 4<sup>th</sup> September 2013 your Discussion Paper 05. I have sought to make individuals not identifiable.

I have taken the opportunity to correct some errors in it. Also, I have renumbered the pages to start the first page of it at 1, rather than starting with 1 on the covering letter.

I am especially concerned that the Civil Aviation Authority's (CAA) computed dB LAeq,16 aircraft-noise contours do not adequately assess the especially intrusive noise-nuisance caused by helicopters. That deficiency is long-standing. It is acute round Aberdeen International Airport which is reputed to be 'the largest heliport in the world'. Aberdeen City Council continues to use BAA's A-weighted and noise-averaging dB LAeq,16 contours in its planning Policy H8 to decide where new houses may not be built. Some other unit of noise measurement should be devised for

Yours faithfully,

RESPONSE TO THE AIRPORTS COMMISSION'S AVIATION NOISE DISCUSSION PAPER  
JULY 2013

Topics:

1. Noise-nuisance from helicopters (page 1).
2. Plans to build new houses where they would be over-flown by low-flying aircraft are not aligned with the Civil Aviation Authority's Rules of the Air (page 5).
3. The construction of noise contours round Aberdeen International Airport (page 7).
4. The 57 dB LAeq,16 noise level is too high for use as a reference level/planning limit for community annoyance (page 9).
5. Should dB LAeq,16 contours be mapped down to 54 dB? (page 10).
6. BAA and the Civil Aviation Authority are not sufficiently independent sources of environmental advice about aircraft noise (page 10).

The **boldings** and underlinings below are mine.

1. NOISE NUISANCE FROM HELICOPTERS:

The main concern that I wish to raise for this Consultation is that Helicopter noise-nuisance is not properly taken into account in the noise metric dB LAeq,16 that is used to construct the aircraft-noise contours used by local planning authorities and others.

That problem is especially obvious round **Aberdeen Airport which is reputed to be the largest heliport in the world**. And yet, no alternative measure of noise-nuisance has been established to accomodate that extra annoyance caused by Aberdeen Airport which is thus a special case.

An Aberdeen City Council (ACC) planning official agreed, in 2005, that the 'noise metric' dB LAeq,16 used to measure aircraft noise is unsuitable for measuring noise from helicopters (see *Appendix 1, Response to Local Plan Issues (page 12) of the Report on The Finalised Local Plan: Green Spaces - New Places: Response to Issues*, placed before ACC's Development Plan Sub Committee on 03/03/05).

Nevertheless, Aberdeen City Council continues to rely on the 57 dB LAeq,16 noise contour when assessing applications for new residential areas round the airport (ACC Policy H8). I have been told in a letter of August 2013 from Aberdeen City Council (ACC) that:

*'The Council has not made any representation to the Scottish Government or UK governments concerning the assessment of aircraft noise around Aberdeen Airport and has no intention of doing so'.*

[And also, incidentally, that *'The Council will not be responding the Commission Discussion Paper on Aviation Noise due to staffing shortages'*.]

**dB LAeq,16 is unsatisfactory for assessing the annoyance caused by helicopters because:**

- The flight paths of helicopters are less predictable than those for fixed wing aircraft. When one hears the thumping noise from a distant helicopter one is left for a long time wondering whether it is going to fly low over where one is.
- Noise from helicopters causes houses to vibrate. That kind of vibration is not 'mitigated' well enough by sound-proofing ventilators and windows; and those 'mitigations' do not reduce noise in gardens and streets. Helicopters should not be allowed to fly low over houses. Conversely, houses should not be built where helicopters and other aircraft must fly low (see Section 2 below).
- The Aircraft Noise-nuisance metric dB LAeq,16 averages the noise ('eq,16') and also **A-weights** it (i.e. discounts frequencies below about 200 Hertz). Therefore, dB LAeq,16 **discounts** the irregular impulsive (thumping) and other low frequency noises from helicopters, recognised to

be especially annoying. See the Scottish Government's Planning Advice Note 1/2011: Planning and Noise:

*'2.63. Because noise levels and frequency content may vary over time, many indices have been developed to describe noise levels. The equivalent continuous noise level over a time period  $T$  ( $L_{Aeq,T}$ ) has emerged as a good general purpose index for environmental noise. For road traffic noise  $L_{A10,18h}$  is still widely used; and to describe background noise the  $L_{A90,T}$  is appropriate noise metric. For those noises characterised by definite tonal characteristics the use of Noise Rating (NR) may be applicable. **These should not, however, be used to measure noise that is irregular or impulsive in character.**'*

which may be found at <http://www.scotland.gov.uk/Publications/2011/03/02104659/3> .

Failing any other noise metric, it might be more appropriate for Aberdeen to use contours that are not A-weighted (e.g., dB Leq,16), but the impulsive noises would still be averaged out. However, in the letter to me of 01/08/2013, ACC wrote that:

*'The Council has not made any attempt to obtain non-A-weighted readings. There is no alternative widely accepted methodology for the assessment of aircraft noise that would assist in the consideration of the planning application.'*

- The social surveys used to relate noise to annoyance were not done in places where there are as many helicopters as now operate from Aberdeen Airport. Further social surveys may be needed if helicopter noise is to be recognised properly. Perhaps Aberdeen would be good place to do one.

I understand that the social surveys that have been done relate dB LAeq,16 to annoyance generally, outside houses as well as inside, so double glazing and other 'noise mitigations' built into houses are not relevant to the choice of 57 dB LAeq,16 to indicate 'the onset of community annoyance'.

- Double (or triple?) glazing? Social surveys suggested that double-glazing did not have a significant effect on the extent to which people were annoyed by aircraft noise (see **CAA DORA Report 9023, The use of Leq as an aircraft noise index, 2.4.5, page 1**):

*'In none of the analyses did the incorporation of this variable (i.e. double glazing) lead to a significantly higher correlation with the disturbance data - the only confounding factor which did so was airport-related employment. The reasons why double glazing had such a little effect are not clear.'*

Possibly the reasons were that people like to talk in their gardens and on their streets and live in a tranquil area? Also, they may wish to leave their windows open. A 'Report on Road and Air Traffic Noise', done earlier this year for a planning application for 65 new houses near Aberdeen Airport claimed that people in Scotland do not need to have their windows open!

- Helicopters round Aberdeen do not follow the usual fixed-wing flight paths. They fly apparently at will and sometimes low over at least 300 square miles of Aberdeen City and Aberdeenshire, especially when training. They fly low over towns and villages round Aberdeen and over places of special natural beauty; they are a wide-spread public nuisance. And yet, the map of helicopter flight paths, dated 2006 and submitted in 2006 by BAA in their Planning Application to extend Aberdeen Airport's main runway showed NO helicopter flight-paths to the West of the line of the main runway.

Aberdeen City Council officers told the Reporter at a session of the Public Inquiry (2006) prior to ALDP 2010 that they had '*no knowledge of*' helicopter flights over areas proposed for new houses to the South West of the Airport – and referred to that BAA map of helicopter flight paths to prove their point. Later, they said that they realised that helicopters do not always stick to their allotted flight paths and have recognised that helicopters do fly to the West of the Airport.

- Noise contours of dB LAeq,16 are unsatisfactory for other reasons also, to do with the mechanics of local planning processes:

Local planning processes are recursive when aircraft noise is considered: Actual levels of aircraft noise were not considered for specific sites when areas for new housing near Aberdeen Airport (some previously greenbelt) were ordained for new residential areas in the current Aberdeen Local Development Plan 2012. And yet, recently, it has been suggested that the Aberdeen Local Development Plan (ALDP) takes precedence over assessments of aircraft noise.

The unsatisfactory nature of local planning processes in relation to aircraft noise maybe seen in the following specific example, in which predictions of aircraft noise levels were rejected:

A Public Inquiry was held to help establish ALDP 2012. The Inquiry Reporters' *Conclusions* about a potential housing site that is about 900 metres to the South West of the South end of Aberdeen Airport's main runway were, as follows:

'OP20 [Part of the Site then identified as 'Site OP20' is now 'Site OP1: Hopecroft']:

(6). This site is allocated for housing in the adopted local plan and on the evidence before me I do not consider that circumstances have changed since its previous allocation. I acknowledge the concerns expressed about traffic issues, aircraft noise, affordable housing, the design of any future housing and existing trees, wildlife and pedestrian links. **However there are in my view adequate safeguards contained within the natural environment, design, housing, transport and other policies proposed in the local development plan, to ensure that these concerns can be adequately addressed at the planning application stage.** I therefore do not propose any amendment to the existing allocation. (See also issue 112 – Housing and Aberdeen airport).'

The Reporter's confidence that '*these concerns can be adequately addressed at the planning application stage*' appears to have been misplaced: Those concerns are not being 'addressed' adequately at the planning application stage as the following example illustrates:

[Bear in mind that ACC's Policy H8 - Housing and Aberdeen Airport (as modified at the insistence of the Inquiry Reporter for Aberdeen Local Plan 2012) states that:

*'Applications for residential development under or in the vicinity of aircraft flight paths, where the noise levels are in excess of 57dB LAeq (using the summer 16-hour dB LAeq measurement) will be refused, due to the inability to create an appropriate level of residential amenity, and to safeguard the future operation of Aberdeen Airport.'*]

A Site near Aberdeen Airport is subject to a planning application to build houses. I attended a Site Visit there as a member of the public.

BAA/CAA's most recently published 57 dB LAeq,16 noise contour (made available in January 2013) is based on air traffic movements in 2011. It just clips the N. East corner of the Site which is thus just outside the area of the 57 dB LAeq,16 contour within which no new houses should be built, as specified in Policy H8. However, BAA/CAA's current maps of noise contours for 2020 and 2040 predict that the 57 dB LAeq,16 noise contour will have moved outwards from the Airport by then to cross the proposed Site. If BAA/CAA's predictions for 2020 and 2040 are fulfilled, then houses built now would be inside the prohibited area later.

However, recently, at an Aberdeen City Council Planning Committee, it was stated that predictions of the position of the 57 dB contour are based on Aberdeen Airport's Master Plan ' - - which is not a statutory Master Plan. It is nothing that we have adopted but is based on the Aberdeen Airport's expansion and hopes for the future. It is only aspirations and therefore the (position of the) 57 dB contour could change completely. Therefore it is considered inappropriate to include any projected contours.' Officials said that they were not aware of any legislation or regulations which dictate that predicted noise levels must or must not be included in any evaluation of a

planning application – ‘that is why we are working on the facts which are that the 57 dB contour for 2011 just clips the boundary of the Site which is thus outside it’.

Thus it has been claimed that BAA/CAA’s noise contours predicted for 2020 & 2040 cannot be taken into account because they are based on the ‘aspirations’ of Aberdeen Airport Ltd. That is not satisfactory; most plans depend on predictions of one sort or another.

Those opinions have been repeated to me by email. They appear to be held in spite of the Scottish Government’s Planning Advice Note 1/2011 which says:

*‘25. Noise from aerodromes is likely to include activities such as engine testing and ground movements as well as aircraft landing and taking off. For major aerodromes, (LAeq16hr) is the conventional unit of measurement for planning purposes, although different metrics are used in the END noise mapping process. Where land is subject to significant levels of aircraft noise, or is likely to become so, **planning authorities should seek the co-operation of aerodrome management in reaching appropriate forecasts of air traffic and its effect on noise contours. The objective will be to achieve a clear and stable pattern of constraints against which planning decisions can be made.**’*

To sum up the lessons of the above specific example:

The acceptability of proposed sites for new residential areas on the grounds of noise was *not determined at the level of the Local Development Plan*, it was left to be considered ‘*at the planning application stage for specific developments*’. But at the level of *planning applications for specific developments*, a local planning authority can ignore BAA/ CAA’s predictions of aircraft noise when assessing *planning applications* for new residential areas.

Also, a planning authority may insist on the latest 57 dB LAeq,16 noise contour as a marker beyond which new houses can be built (even though it may be 3 or more years out of date), but can ignore the facts that dB LAeq,16 (a) does not include the most annoying part of the spectrum of noise produced by helicopters, (b) that it does not include noise from ground-running, (c) that it does not include noise from aircraft that fly during the night and (d) that it does not adequately reflect the number and effect of individual overflights.

I believe that the constraints of aircraft noise for new housing developments, schools etc should be set at a national level, by an independent authority, not financially connected to the air-transport industry (see below) and not left so much to the judgement of local planning authorities.

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## 2. PLANS TO BUILD NEW HOUSES WHERE THEY WOULD BE OVER-FLOWN BY LOW-FLYING AIRCRAFT ARE NOT ALIGNED WITH THE CIVIL AVIATION AUTHORITY’S RULES OF THE AIR:

Again, I illustrate this comment by reference to conditions near Aberdeen Airport.

- The height at which aircraft, including helicopters, fly round Aberdeen Airport:

Aberdeen Airport wrote, in a letter to me of 2nd March 2005:

*‘I note your comments that you live approximately 1 mile from the end of the runway. Any aircraft flying an instrument or visual approach will be approximately **300 feet** altitude at that point. This **300 feet** altitude is in reference the ground level of the airfield therefore given that Bucksburn is on higher ground than the airfield the clearance height over Bucksburn is less’.*

Similarly, in a letter to me of August 2006, Aberdeen Airport wrote

*‘I have again consulted with Air Traffic Control and would advise that the 500-700 feet you estimate helicopters to be flying at is rather high in your locality. We expect helicopters to be circa **400 feet** when correctly aligned to the 3<sup>rd</sup> glide slope which they follow when making an approach*

*to the southern runway. Any helicopters passing your house are operating as part of the scheduled services to the North Sea or those which have been on their training routine returning from the Loch of Skene area. As stated in previous correspondence Air Traffic control have the ability to monitor the altitude of each aircraft as they come and go from Aberdeen therefore we can confidently state that any helicopters passing over your residence are at the correct altitude for making an approach or departure. - - - it is common practice for helicopters to join from left or right of the centreline at a point one to two miles from touch down..'*

More recently (November 2012), Aberdeen Airport wrote

*'Air Traffic Control have confirmed that the Bristow helicopter over your house was at the 500ft min. above ground level height.'*

The true number and impact of these over-flights by helicopters has been underestimated by Aberdeen City Council and in Aberdeen Airport's maps of noise contours also (see above).

- However, according to the Director of Airspace Policy Environmental Information Sheet No.2 (CAA); see [http://www.caa.co.uk/docs/7/EIS\\_02.pdf](http://www.caa.co.uk/docs/7/EIS_02.pdf) :

*'Aircraft, including helicopters are not permitted to fly over a congested area of a city, town or settlement below a height of 1000 feet above the highest fixed obstacle within a horizontal radius of 600 metres of the aircraft or below such height as would enable it, in the event of a power unit failure, to make an emergency landing without causing danger to persons or property on the surface.'*

*Away from congested areas, aircraft, including helicopters, are not permitted to fly closer than 500 feet to any person, vessel, vehicle or structure (Note: this is a minimum distance, not a minimum height: the distance of 500 feet is measurable in any direction, not just the vertical).'*

Surely, if aircraft are not supposed to fly within 1000 feet (or 500 feet?) of 'congested areas' then new congested areas should not be built within 1000 feet of where aircraft must fly.

- Therefore, I made the following suggestion in my submissions to the Public Inquiries prior to Aberdeen Local Development Plans 2008 and 2012:

*"The legal requirement for height does not apply close to airports, but if ' - - - Aircraft, including helicopters are not permitted to fly over a congested area of a city, town or settlement below a height of 1000 feet above the highest fixed obstacle within a horizontal radius of 600 metres [1968 feet] of the aircraft - - - ', then Aberdeen City Council will be irresponsible if it allows new residential developments to be built where the more general height requirement of 1000 feet cannot be maintained."*

I emphasised that proposal in an additional submission, about BAA's **Aberdeen Airport Noise Action Plan 2008-2013**, that the Reporters asked for in relation to ALDP 2012. Neither the Reporters nor Aberdeen City Council's Responding Officer mentioned or commented on my suggestion in their written responses and conclusions.

Some time ago, I asked Aberdeen Airport;

*'What is Aberdeen Airport Management's attitude to proposals to build yet more houses under where aircraft currently fly below 1500 feet [now reduced to 1000 feet] on approach or landing or when doing circuits?'*

They replied to say that: *'Aberdeen Airport is unable to comment on this and whether the proposed housing scheme proceeds is purely a council planning issue - - -'*

And yet, Aberdeen Airport's current draft Noise Action plan states that they seek to *'influence planning policy to minimise the number of noise sensitive properties around our airports.'*

More recently, I have submitted my suggestion to Aberdeen City Council's current revision of its Local Development Plan 2012 for ALDP 2016 (an 8-week non-statutory consultation period that ran from 15 April to 14 June 2013) see:

[http://www.aberdeencity.gov.uk/planning\\_environment/planning/local\\_development\\_plan/pla\\_aldp\\_current\\_consultations.asp](http://www.aberdeencity.gov.uk/planning_environment/planning/local_development_plan/pla_aldp_current_consultations.asp)

My suggestion to Aberdeen City Council may be found by clicking on 'JOHNSON 001' at

[http://www.aberdeencity.gov.uk/planning\\_environment/planning/local\\_development\\_plan/pla\\_2016\\_question\\_and\\_represents.aspat](http://www.aberdeencity.gov.uk/planning_environment/planning/local_development_plan/pla_2016_question_and_represents.aspat)

Or at <http://www.aberdeencity.gov.uk/nmsruntime/saveasdialog.asp?IID=52104&sID=23540>

If that suggestion is unreasonable, I should like to know why. If it is reasonable, then it should be ordained nationally (if late in the day for many places).

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### 3. THE CONSTRUCTION OF NOISE CONTOURS ROUND ABERDEEN INTERNATIONAL AIRPORT:

- Do the Airport's noise-contours for 2011 take proper account of noise from helicopters, especially those that fly low?

A letter to me of March 2005 from Aberdeen Airport said that:

*'Aberdeen Airport does not record the lateral scatter of flight paths, however as xxxxxxxx from the CAA stated in his reply, the production of noise exposure contours of Aberdeen Airport is based upon realistic **assumptions** about flight paths and track dispersion'.*

I have, repeatedly, asked the CAA and Aberdeen Airport Ltd about that apparent lack of record and about the nature of the 'assumptions': I emailed the CAA's Environmental Research and Consultancy Division in March 2013 with **the following seven essential questions** about the computation of aircraft noise contours at Aberdeen. I received a friendly reply in April 2013 promising answers. But I have had no answers.

- Do the airport's predicted noise contours for 2020 and 2040 take account of the more noisy helicopters that are now replacing the present Sea King helicopters?
- To what extent has the CAA, when computing noise contours at Aberdeen Airport, relied on a map of helicopter flight paths dated July 2006 (Figure 7.5 in BAA's planning application for a runway extension) that shows NO helicopter flight-paths to the West of the main runway?
- What helicopter flight paths/tracks and heights were entered into the CAA's ANCOM computer model to compute the (contour) maps?
- How do the data for numbers and noise of helicopter flights used for noise contours that bend slightly inwards at the South West of Aberdeen Airport differ from the data that cause contours to bulge outwards round helicopter flight paths at the East side of the Airport?

[Compare the 57 dB contour for Aberdeen Airport 2006 ('actual') with that for 2011 ('actual'): The 57 dB LAeq,16 noise-contour for 2011 ('actual') shows large extensions Eastwards that coincide with helicopter flight-paths there. Conversely, part of the 57 dB contour for 2011 at the South West of the main runway (over Hopecroft) has moved slightly inwards from its position given for 2006; it shows little or no outwards bulge to indicate the actual frequent low flights of helicopters over that area.]

- How accurate are the CAA's computed noise-contours for Aberdeen?:

It is usual to provide estimates of uncertainty for scientific measurements, perhaps with limits of confidence. I have not been able to find estimates for uncertainty in dB LAeq,16 except in the ERDC Report 0506 'Precision of Aircraft Noise Measurements at the London Airports, by S. White (2005), and possibly ERDC Report 0209. In paragraph 5.1 of Report 0506, a 'final value of expanded uncertainty' for 'a typical noise study' is given as 'approximately +/- 1.5 dB, with a confidence limit of 95 percent' (see also 7.1 in that Report).

- Would that range of uncertainty apply to the values of dB LAeq,16 in the noise-contour maps computed for Aberdeen?
- How would limits of error like that translate into distances in meters on either side of the contours?

I think that the CAA should be more forthcoming with information about its computation of aircraft noise contours. One might try a Freedom of Information Request, but should they not the CAA be more open about such questions? However, if predicted contours can be dismissed as mere 'aspirations', one might understand the CAA's reluctance to explain them.

- The noise-contour 'metric' dB LAeq,16 ignores noise from **ground running** at airports. Noise from ground running is not included in the noise contours:

Areas of housing and areas designated for new housing round Aberdeen Airport are subject to noise from the ground running of helicopters (mainly low frequency noise from their rotors) and from fixed-wing aircraft (often turbo-props). Noise from turbo-prop aircraft running their engines on the ground is also sometimes intrusive. These noises sometimes last for periods of over an hour. Also, noise from reverse thrust is sometimes disturbing, sometimes late at night. These kinds of noises are intrusive in areas of housing all round Aberdeen Airport.

Aberdeen Airport Ltd have confirmed to me that ground running is not included in the CAA's maps of noise-contours. Those noise contours are used by Aberdeen City Council in relation to its planning Policy H8 2012 (see page 4 above).

I have been assured, in a letter from Aberdeen City Council (December 2012) that '*Environmental Health is aware of the intrusive nature of the noise generated by the ground running of aircraft engines and helicopters. A survey was commissioned by BAA*'. Recently, noise from ground-running has been much discussed by BAA's Aberdeen Airport Consultative Committee.

Ground noise continues to be intrusive in residential areas and potential residential areas round Aberdeen Airport, in spite of Aberdeen Airport's press-release about noise from ground running, dated 17/07/2008.

### **Noise from ground running should be represented in the noise contours for airports.**

- The noise-contour 'metric' dB LAeq,16 is based on noise between 07:00 and 23:00, and thus it, ignores noise from night flights. Aberdeen Airport wakes up before 07:00.

In 2005, ACC reversed its long-standing planning condition of no night flights (except for emergencies) at Aberdeen Airport. It was claimed in the local press and at a meeting of the full Aberdeen City Council that 'only 50 will be awakened' – implying per night. In fact, the BAA/ENVIROS Noise Impact Assessment for BAA's application to lift the ban on night flights indicated that about 50 or more (depending on the estimated size of the affected population) would be awakened '*per flight of an A321 Airbus or similar*' but only if one combined information from two separate pages: Strangely, the Executive Summary of that Noise Assessment did not address directly the obvious question 'how many people would be woken?'.



My wife and I are awakened regularly between about 3 am and 4 am and so are some of my neighbours, possibly by a mail plane and by others.

No attempt appears to have been made to discover how many people at Aberdeen are actually woken by aircraft.

**Noise from night flights should be taken account of in the noise contours for airports.**

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4. THE 57 dB LAeq,16h NOISE LEVEL IS TOO HIGH FOR USE AS A REFERENCE LEVEL/  
PLANNING LIMIT FOR COMMUNITY ANNOYANCE:

**ANASE (Oct. 2007) ‘Attitudes to Noise from Aviation Sources in England’ (Executive Summary) Section 1.4.1** concludes that ‘*However, for a given LAeq, there is a range of reported annoyance indicating that annoyance is not determined solely by aircraft sound as measured by LAeq.*’

The Government, in its **Draft Aviation Policy Framework, Annex D: Noise Descriptors (July 2012)** says:

**‘D.6** The Government acknowledges that the balance of probability is that people are now relatively more sensitive to aircraft noise than in the past. **We recognise that people living outside the 57 dB LAeq,16h contour are also affected by aircraft noise and that, for some, the annoyance may be significant. Indeed, many complaints about aircraft noise come from outside the 57 dB LAeq,16h contour.**’

**‘D.7** As there is no conclusive evidence on which to base a new level, for the present time we are minded to retain the 57 dB LAeq,16h contour as the average level of daytime aircraft noise marking the approximate onset of significant community annoyance. However, to facilitate monitoring to provide more information about noise impacts we would welcome views on whether it would be useful to ensure that the contour maps produced annually to show noise exposure around the designated airports are drawn in future to a lower level. **We consider that there are two measurement options. One is to use Lden and produce contours down to 55 dB(A). This aligns with the level to which airports are required to map noise exposure under the END. The other alternative is to continue to use 54 dB LAeq,16h which is the next logical step down from the current 57 dB LAeq,16h contour along with the concurrent production of night noise contours (LAeq,8h).**’

See: <https://www.gov.uk/government/consultations/draft-aviation-policy-framework>

The statement:

*‘As there is no conclusive evidence on which to base a new level, for the present time we are minded to retain the 57 dB LAeq,16h contour as the average level of daytime aircraft noise marking the approximate onset of significant community annoyance.’*

skates over much adverse comment that has been made about the conclusion that 57 dB LAeq,16 marks ‘the onset of community annoyance’ – most cogently in the article by H.F. Jones ‘Validity of LEQ as a Predictor of the Impact of Aircraft Noise on People from HACAN’. That low level of ‘onset’ appears to favour the air transport industry and allows local planning authorities to build houses where people cannot carry on conversations in streets and gardens and on ‘patios’.

The flicker of doubt ‘- - **that people living outside the 57 dB LAeq,16h contour are also affected by aircraft noise and that, for some, the annoyance may be significant.**’ should be recognised. Note also the Government’s use of ‘approximate’. The level of ‘approximate onset’ should be brought down to at most 55 dB (or to be mathematically appropriate, 54 dB) to be in line with the World Health Organisation’s level of 55 dB LAeq,16.

Hopefully, a move to Lden will not be taken as a chance to put the level of ‘approximate onset’ up – as happened with prices when the currency was decimalised - or to confuse people with a new system as happened when NNI was abandoned. Incidentally, some maps of Lden contours depict the terrain under the contours in a very indistinct way. That will cause confusion if the contours are to be used to show where houses may or may not be built – as happened recently at Aberdeen with a fuzzy map of dB LAeq,16 (2006 actual) contours that was reproduced by BAA in **Aberdeen Airport Noise Action Plan 2008-2013**.

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#### 5. SHOULD dB LAeq,16 CONTOURS BE MAPPED DOWN TO 54 dB?

Yes, they should be. Aberdeen City Council, for example, uses the (outer) 57 dB LAeq,16 noise contour for its Policy H8 (see above). A 54 dB contour would provide a better indication of the spread of noise beyond 57 dB and would place the 57dB better in context. A 54 dB contour is needed to see the 57 dB contour in relation to the range of noise and community annoyance beyond it.

However, if, as should be implemented, the critical contour is soon reduced from 57 dB to 55 dB or to 54 dB LAeq,16, then perhaps the outer contour should be 52 dB or 51 dB.

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#### 6. BAA AND THE CIVIL AVIATION AUTHORITY ARE NOT SUFFICIENTLY INDEPENDENT SOURCES OF ENVIRONMENTAL ADVICE ABOUT AIRCRAFT NOISE:

Aberdeen Airport Noise Action Plan 2008-2013 contained a table of proposed actions. Most of those were about community relations. The **Aberdeen Airport Noise Action Plan 2008-2013** was very much a public relations exercise (and remarkably few people appear to have been consulted for it). However, currently, a consultation is open for a new version of the Aberdeen Airport Noise Action Plan.

Nevertheless, Aberdeen Airport Ltd is the body designated to receive and handle complaints about aircraft noise. Aberdeen City Council considers the number of complaints received about aircraft noise when it gives planning permission for new houses near the Airport. Aberdeen Airport Ltd says that it does not receive many complaints; how often should or would a resident complain?

Aberdeen International Airport Ltd belongs to Heathrow Holdings Ltd, which belongs to Ferrovial, a Spanish transport company. BAA ceased to be an ‘authority’ when it became a plc. It is wrong that a commercial enterprise is still allowed to be a main source of information about its own environmental nuisance. It is not in Aberdeen International Airport Ltd’s interest to call attention to the effects of its own environmental nuisance. Even the CAA is funded by ‘*those that it provides services for*’.

A more independent body is needed, to provide reliable information and regulations about aviation noise to local planning authorities and others.