

Response to the Airports Commission: Aviation Noise Discussion Paper
Submitted by Zac Goldsmith, MP for Richmond Park and North Kingston
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Introduction

- I welcome the Airport Commission's consideration of the aircraft noise impacts of potential airport developments and am grateful for the opportunity to respond to the Airports Commission's discussion paper on Aviation Noise.
- As the Commission recognises, the growth of affordable mass air travel has resulted in increasing numbers of people being affected by aircraft noise. Nowhere is this truer than in the areas of West London adjacent to Heathrow where aircraft noise has become a major concern for local residents due to the corresponding growth in the number of flights at Heathrow, now the world's busiest international airport.
- As a Member of Parliament for a constituency located under the Heathrow flight path, I wish to highlight the current significant impact of aircraft noise on the people living and working under its flight paths, and the potential impact of a third (and fourth) runway at Heathrow.
- I would also like to place on the record my support for the responses to the discussion paper by HACAN Clearskies and the Richmond Heathrow Campaign.

Heathrow is in a league of its own with the number of people affected by aviation noise

- I welcome the clear recognition in the discussion paper that noise from Heathrow and its flight paths affects many more people than anywhere else in Europe. More than a quarter of all people in Europe who are affected by aircraft noise pollution are under the Heathrow flight path.
- Table 2.1 in the paper lists in order the UK airports whose noise footprints affect the largest number of people. Heathrow tops the list with 258,500 as the size of population affected by 57LAeq16h contour.
- Table 2.2 does the same, but compares the noise footprints of large European airports. Again, Heathrow tops the list with 725,000 as the size of population affected by 55Lden contour. However, other estimates for the number of people affected range as high as 2 million, depending on the study and the level of noise taken as sufficient to cause a nuisance.
- The areas heavily overflown include some of the most densely populated wards in the UK. A third runway at Heathrow would only increase the scale of the noise impact on such a large population.

Concerns of local residents on aircraft noise

- As I hope the Commission will no doubt see from submissions it is receiving, the strength of feeling on this issue from my constituents is overwhelming. I have no doubt that a typical response from a resident will express the following views:
 - *Noise nuisance is a very significant issue for those who live in the area around Heathrow and this has a significant detrimental impact on the quality of their lives and health;*

- *All steps should be taken to improve the quality of noise reporting;*
 - *Residents are frequently woken early in the morning by aircraft;*
 - *Any extension to night flights before 6am will be strongly resisted by local residents;*
 - *It is reasonable not to expect residents to continue to put up with the existing level of noise and pollution, let alone a worsening situation;*
 - *The existing rotation of runways provides local residents with much valued respite to the constant noise that runs all year.*
- The discussion paper also cites the work undertaken by the European Environment Agency which found that 27% of people are ‘highly annoyed’ at 55dB (Lden) due to aircraft noise, whereas only 6% of people are ‘highly annoyed’ by road noise of the same noise level. This, the paper argues, “supports the view that people are more sensitive to aircraft noise than other noises”. I would like to echo the point made in the HACAN response that the experience of my constituents would bear out this view.
 - I urge the Commission in the strongest possible terms to take the concerns of many of my constituents into account.

Heathrow expansion and noise

- A third runway at Heathrow would be a noise disaster and would lead to a serious further reduction in the quality of life for hundreds of thousands of London residents. This was recognised by the Government’s draft aviation strategy: “The Government’s opposition to the building of a third runway at Heathrow was, and continues to be, determined in large part by a concern about the scale of the noise impacts at the airport”. A third runway at Heathrow would only increase the scale of the noise impact.
- The current 480,000 air transport movement cap was set as a condition of the Terminal 5 planning consent in 2001. A third runway would require an increase in the number of air transport movements allowed at Heathrow. To change or remove the cap would require a planning application. The Labour government constrained capacity at Heathrow with a third runway until at least 2020 to 605,000 ATMs-and full capacity would have been 702,000 ATMs. 605,000 ATMs equates to 125,000 additional movements compared to the current cap of 480,000 ATMs at Heathrow; 702,000 ATMs equates to 222,000 additional movements.
- A third runway leading to 702,000 flights using Heathrow a year represents a 46% increase on today, and, as the Government has said, would result in an unacceptable level of environmental damage to the quality of life of local communities. It is self-evident that the lives of two million Londoners would be significantly affected by aircraft noise if Heathrow expansion goes ahead.
- Furthermore, as the Environment Committee of the London Assembly highlighted in its report ‘Plane Speaking: Air and noise pollution around a growing Heathrow Airport, March 2012’, of particular concern is the significant contribution to noise pollution made by people using private cars and taxis to get to and from the airport. At the moment almost two-thirds of the 66 million passengers using Heathrow every year travel by car. Once the current redevelopment and construction projects at the five terminals are completed, from around 2014 onwards Heathrow will have the capacity to handle up to 95 million passengers a year. This will clearly have

implications for local residents and communities, facing the probable prospect of increased road traffic, even poorer air quality and more noise.

- A third runway with the accompanying increase in the number of air transport movements would only serve to compound this impending impact further with the ensuing increased road traffic and more noise-and a serious reduction in the quality of life for hundreds of thousands of people. The aviation industry has not explained how London is supposed to deal with the estimated 25 million extra road passenger journeys each year to and from Heathrow (from a third runway alone). It seems likely that such an increase would cause gridlock, with dire consequences for London's economy.

Measuring aviation noise

- The measurement of noise – and of noise annoyance/disturbance – needs revising. Currently it is misleading. The current 57 db Leq contour – the official area which defines where community annoyance sets in - excludes places like Putney and Fulham in West London. . Any noise measurement that does not reflect reality lacks credibility.
- As the discussion paper notes, the Government in its Aviation Policy Framework issued in March 2013 recognised the weakness of the current measurement: *“Average noise exposure contours are a well-established measure of annoyance and are important to show historic trends in total noise around airports. However, the Government recognises that people do not experience noise in an averaged manner and that the value of the LAeq indicator does not necessarily reflect all aspects of the perception of aircraft noise. For this reason we recommend that average noise contours should not be the only measure used when airports seek to explain how locations under flight paths are affected by aircraft noise.”* This is a welcome development.
- I recognise that finding the best noise metric(s) will not be easy and no metric will be perfect but I believe that the one option that is not feasible is a continuation of the status quo because it is so unreflective of reality.

Night noise

- I welcome the Commission's acknowledgment of the concerns that local communities have about night flights.
- The discussion paper notes, “WHO Europe guidance sets an interim maximum target for noise levels of 55Lnight, and a long-term maximum target of 40L.....to achieve even the WHO Europe interim target in London would essentially require a near complete closure of the transport system between 23:00 and 07:00”. This clearly would be untenable at present but a distinction ought to be made between shutting down the nation's road system, which could not be done, and ending night flights which is more realistic.
- I would like to take this opportunity to draw the Commission's attention to the report ‘A Ban on Night Flights at Heathrow Airport’ from independent economic consultancy CE Delft, published in January 2011, which shows that a ban on night flights at Heathrow before 6am could be expected to have overall benefits for the UK economy. The report finds that economic savings could be expected from the avoidance of monetary costs associated with the sleep deprivation of the number of

people living under the Heathrow night flight path (over half a million people - the highest number of any city in Europe).

- For the record, I support a ban on night flights between 11pm and 6am. But if night flights do continue, I share the HACAN view that it is inappropriate to average out the noise at night unless there are a large number of flights throughout the night at an airport. At Heathrow, where there are just 16 scheduled flights between 11.30pm and 6am (plus on average one unscheduled take-off in the late evening), the cap on the number of events is much more meaningful.

Conclusion

- I welcome the Commission's commitment to both make noise a central issue in Commission's assessment of options to increase UK airport capacity, and its commitment to carry out its work in the context of the Government's high level objectives on aircraft noise. As the discussion paper notes, the Government's recent Aviation Policy Framework (APF) stated that: "the Government's primary objective is to limit and where possible reduce the number of people significantly affected by aircraft noise".

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