

## **Blackheath Society**

### **Response to Davies Commission Consultation on the short- listed options**

I am writing on behalf of the Blackheath Society in response to the Consultation offered by the Davies Commission on its analysis of the short – listed options for a further runway at Heathrow or Gatwick. I have lived in Blackheath and been a member of the Society for very many years.

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 interest, and generally to protect the local environment.

We are not using the Response Form. Instead we will be making a number of points which we believe represent the views, and in many cases the strong views, of the members of this Society who on a daily, and of course nightly , basis suffer from the noise of aircraft flying overhead about every 90 seconds for long periods of the day and part of the night. In August 2013 we submitted a Paper to the Commission in response to the Commission's own Aviation Noise Discussion Paper. We would repeat all the points made in our Paper. In addition in response to the Consultation on the short – listed options, we wish to say the following, concentrating on the Commission's assessment of noise relating to the Heathrow Extended North Runway and the Heathrow North West Runway

#### **Is the Commission's noise assessment credible?**

In general we would not quarrel with the noise assessment for the Extended Runway. The Commission's noise assessment for the North West Runway is a different matter.

Figure 9.8 relating to the North West Runway appears to show, taking the 55 Lden metric, that the number of people affected by aircraft noise will fall from about 760,000 at the present time with 2 runways in operation to about 550,000 in 2030 with 3 runways in operation. This is despite the fact that during that time ATMs will have increased from about 480,000 as of now to an estimated 652,000 ATMs in 2030. This is a quite extraordinary result and completely different from the picture shown in the corresponding Figure 9.7 in the Section on the Extended Runway. The noise contours for the 2 proposals are slightly different from the present day ones, and at the far west and far east ends of the contours aircraft are flying over different parts of London, although no work has been done on the actual flight paths which will be used. However we don't believe that, even using the flight paths assumed by the Commission for the purposes of modelling, this can possibly account for the difference in the numbers of people affected by aircraft noise which appear to be shown by Figure 9.8 of the North West Runway assessment. As far as we can see there are no other explanations. Based on past experience, introduction of quieter aircraft cannot be the explanation since this is a very gradual process extending over many years. Introducing a steeper glide path is only

factored in from 2050. And no work has been done on the actual flight paths which will be used. In conclusion we do not believe that the position on noise pollution shown by Figure 9.8 in the North West Runway assessment will be regarded by the man in the street (or rather the man under the flight path) as credible, and this of course affects our view on the other graphs as well.

### **The Commission's assumptions**

The Commission, towards the beginning of each of the Sections dealing with its assessment of noise for each of the North West Runway and the Extended Runway proposals, refers to the assumptions and inputs which it has used in its modelling, referring to some of these but not all. The Commission also states that the indicative flight path designs should not be taken as showing where future flight paths would be located. In Paras 9.13, and following, of the Section dealing with the North West Runway the Commission appears to accept the limitations of modelling and indeed in footnote 63 to 9.17 the Commission points out that the result of a particular piece of modelling highlights how sensitive noise modelling is to underlying assumptions.

The Commission's conclusions from its use of modelling appear to be set out in Para 9.14 of the Section dealing with the North West Runway proposal. The Commission states that "the modelling shows that developments in airplane technology and flight routing are capable of reducing the numbers of people exposed to annoying overflight compared to today's levels". We think this is a reasonable conclusion, but we note the use of the word "capable". The real question is "will they", and if so "when" and "to what extent". However this statement by the Commission stands in contrast to the graphs and some of the statements earlier in the Section which appear to be drawing much more definitive conclusions from particular sets of assumptions and inputs.

### **What we know as opposed to what we can derive from models**

What we know is that Heathrow is an environmental disaster, on almost any criteria, and also in comparison with the position in other major European airports. Building a third runway or extending an existing one will increase ATM's from about 480,000 at present to about 740,000 in the case of the North West Runway and 700,000 in the case of the Extended Runway. All of these will have to overfly London, or outskirts of London to the west. It is reasonably well accepted that it is the constant repetition of aircraft noise overhead which most upsets people. Developments in aircraft technology will probably over time gradually reduce the noise from an overflying aircraft. However it cannot in the foreseeable future reduce the level of noise to such an extent that it will cease to be a problem for those on the ground. Increasing the number of ATM's from 480,00 to 700,000/740,000 can only exacerbate the aircraft noise problem for those living in London.

### **Night Flights**

The Commission includes the night period in its modelling and graphs, on the assumption that the current arrangements on flights during the Night Quota period and the shoulder

periods continue. However we are surprised that the Commission has not reached even a preliminary view on the merits of continuing or reducing night flights. The Commission must be aware that the noise from night flights are extremely troublesome to many people, much more so than aircraft noise during the day. Blackheath is under the flight path for aircraft approaching Heathrow from the east. Aircraft start coming overhead from about 4.30 am onwards, and from 6.00 to 7.00 am there are aircraft overhead on most days at intervals of about 90 seconds. Once people are woken up, they often find it difficult to get to sleep again. The same goes for children. Sleep deprivation can have serious consequences, not only the next day when adults can find it difficult to work at their usual levels, and children can have problems concentrating at school, but there may also be longer term health problems, such as strokes as well as impairment of cognitive development in children. The Commission must be aware of the considerable research and literature on this issue. There is also the larger question of what quality of life we are entitled to expect in a civilised city such as London. It seems surprising that even at this late stage in the Commission's proceedings, the Commission still feel unable to say anything about night flights (Para 9.20 of the Noise Assessment of the Extended Runway proposal). This is despite the fact that the proposer of the Extended Runway Scheme has committed himself to discontinuing night flights during the Night Quota Period.

We have also noted that the Commission in its Interim Report recommended that, in order to smooth early morning arrivals at Heathrow, trials should be conducted on increasing the number of arrivals during the 05.00 – 05.59 period from 16 to 35, thus almost doubling the number of arrivals currently permitted during the Night Quota Period. There were suggestions by the Commission as to how respite might be provided to those near to Heathrow by alternating runways. However this relief would not have any affect on areas further from the airport but close to or under the flight path, such as Blackheath and many other areas of London.

All this suggests to us that the Commission have not yet fully understood the problems which night flights cause to the people of London.

We believe that, in a reasonably civilized society, there should be no night flights between 11.30 pm and 6.00 am. In addition we should be seeking to progressively reduce the number of flights between 6.00 and 7.00 am.

## **Metrics**

The World Health Organisation has found that the onset of moderate community annoyance starts when it averages out at 50 decibels over a 16 hour day. It would have been helpful if the Commission had used this metric since it would have allowed aircraft noise in places such as Blackheath and many other parts of London to be properly assessed.

The Commission have also chosen not to use Sound Level Event Histograms to measure noise. These do not rely on averaging, but show what most citizens are interested in, namely how many noisy aircraft events have occurred in a particular locality during a certain time period, and giving the numbers of these events in each of the decibel bands from 50-55 up to

at least 75-80. Further information about this metric was given in our August 2013 response to the Aviation Discussion Paper.

### **City Airport**

Blackheath suffers from the combined noise effects of Heathrow and City Airport. For westerly approaches to Heathrow we are under the Heathrow flight path and at the point where incoming flights to Heathrow converge on the centreline from both the north and the south. We can also see and often hear flights taking off from City Airport towards the west. Thus on westerly approaches we can often see 3 or 4 aircraft in the air at the same time, and of course hear the noise associated with them. It is like living under some busy crossroads in the sky. On easterly approaches, when we have relief from planes approaching Heathrow, we are often overflown by planes flying at a low altitude approaching City Airport, flying in a north westerly direction before turning over the river on their easterly approach to City. The noise from aircraft leaving or approaching City Airport must already affect a considerable area of South East, as well as North East, London. This will get worse as City Airport expands.

At present City Airport have Planning permission for 120,000 ATM's a year, increased from about 70,000 in 2009. In 2013 the airport handled over 3.3 million passengers, it served 47 destinations (including trans-Atlantic flights) and there were 74,000 ATM's. City Airport are seeking permission to build new infrastructure at the airport to accommodate a new generation of aircraft, including some larger aircraft which will no doubt increase the airport's long-haul capabilities. This infrastructure is to include 7 new aircraft parking stands, 4 upgraded aircraft parking stands, an extended taxi-lane for aircraft, extensions to the terminal building, a new multi-storey car park, a 260 bed hotel and many other new or improved facilities.

London City are also currently applying for a Flight Path change. This will be more concentrated than the existing one. The proposed new flight path over South East London will certainly be very close to Blackheath since it is due to pass over Eltham, Catford and Dulwich. It has been calculated that after the proposed flight path change, those under the new concentrated flight path could at the busiest times of day have an aircraft overhead every 90 seconds.

The vision of City Airport for 2030 is to expand the airport to its maximum capacity of 8 million passengers per annum. For further expansion, an additional runway will be required.

We hope it will be apparent from this that the South-east of London already suffers from a double dose of aircraft noise, and the position will only get worse in the future.

We are not aware that the existing and likely future noise impact of City Airport has been factored into the Commission's thinking.

## **Dispersal or Concentration**

There seems to us to be a couple of basic rules of fairness as between the communities affected which should apply in order to make unavoidable aircraft noise more tolerable. The first is that sensible periods of respite must be given to those who live near a major airport. However communities who live outside a point which is about 7-10nm from the point of touchdown also need relief. To simply extend the centre line further and further out and have all incoming aircraft fly down it, will only exacerbate the present situation for Heathrow and make the noise ghettos even worse. The only fair way to proceed is to disperse the noise, including over areas which have not experienced aircraft noise before. Thus whereas 40 planes per hour passing overhead can be regarded as intolerable, 4 planes per hour is something which most people would probably regard as tolerable. Once the essential technical devices to achieve this are available, the flight paths into Heathrow, whether for a 2 runway airport or for either of the current proposals if adopted, should be reviewed with a view to achieving this outcome or as near to it as is possible. This should be a major priority.

## **The two proposals for the expansion of Heathrow**

We are totally against any proposal for the expansion of Heathrow. The present situation is already intolerable, and the suggestions which Heathrow itself has put forward for alleviating the noise problem at Heathrow should be put into effect as soon as possible in the context of the current 2 runway airport. The human cost involved in demolishing whole villages, and residents having to move from their homes, is far too high. Under either proposal it seems highly unlikely that the current respite arrangements for those living near the airport will continue, and certainly not when the airport is once again at full capacity. There will be enormous disruption on and around the M4 and the M25 when the massive road works are undertaken.



on behalf of the Blackheath Society

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