

Dear Sir Howard,

As a seasoned campaigner, I find it all somewhat ironic. You will have noticed from the number of pro-forma letters your Commission has been receiving that Heathrow Airport and Back Heathrow have strained every sinew of their advertising budget to try to persuade as many people as possible to email or write to the Commission that they want a third runway at Heathrow.

As you know, that is not the issue the Commission has been seeking to address in its current consultation. It has been asking a series of fairly technical questions on whether it has accurately assessed the pros and cons of the three shortlisted options. What it is not assessing is the level of support for each option.

The irony is that, as a rule, it is campaign groups which use – and indeed sometimes abuse - this sort of consultation as a hook to bombard the authorities with objections. Not this time. The roles have been reversed.

While most of the campaign groups have stuck to making the arguments, Heathrow, together with its sidekick Back Heathrow, have engaged in an orgy of activity.

- Passengers have been invited to pop letters of support into special post boxes which you may have seen dotted around the terminals.
- The airport emailed all its Heathrow rewards members asking them to respond.
- Airport staff have been queuing up to sign the pro-forma letters (having doubtless carefully considered every word of your weighty report in their tea-break).
- Back Heathrow, slick campaigners that they are, have used their website to make it as easy as possible for their supporters to send the Commission emails and letters supporting expansion.

I think the Commission can expect tens of thousands of standard letters and emails supporting Heathrow expansion.

You will get some responses from HACAN members and supporters but we have deliberately not set out to generate a mass of pro-forma letters and emails. We simply think they are a side-show to the serious work your Commission is undertaking.

Thank-you for taking the time to read this letter,

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# Airports Commission Consultation

## Response from HACAN

February 2015

HACAN is the long-established organisation which gives a voice to residents under the Heathrow flight paths: [www.hacan.org.uk](http://www.hacan.org.uk)

We haven't answered the questions one by one as our points range across a number of the questions.

### **1. Noise metrics and the areas impacted by noise**

**It is essential to use the best possible metrics in developing a sound policy on noise.**

**The Commission's approach is largely to be commended.** It is significantly better than the one adopted in the past by the Department for Transport: a reliance of 57Laeq, with a nod in the direction of 54Laeq.

We welcome the Commission's view (para 2.50) that "the approach to assessing aviation noise impacts has been informed by responses to the Commission's discussion paper on aviation noise, published in July 2013. These indicated that a noise assessment based on any single metric would be unlikely to provide a rounded view of the potential impacts of any proposals for expansion." We therefore welcome the use of 55Lden, 54Laeq, 48Laeq (for night), N70 and N60 metrics.

The Commission has effectively killed off the view that the 57Laeq contour accurately represents the onset of community annoyance. In its final report, we would urge the Commission to state boldly that in future 57Laeq should only be used for the purposes of historical comparison.

**However, there is still more work that the Commission could usefully undertake on metrics. Even the 55Lden and 54Laeq metrics are not fully capturing the extent of the noise annoyance.**

In a typical year, the majority of emails HACAN receives from people disturbed by noise are from areas beyond even the 55Lden boundary. This is not captured at present in the metrics the Commission has used. With the caveat that the majority of people living in these areas are probably not disturbed by the aircraft noise, it is important that, if the Commission is to accurately map the extent of noise disturbance and to assess measures which may reduce or mitigate it, for it to do some more work in this area.

**There are three types of geographical areas where noise disturbance occurs that are not covered by the 55Lden or the 54Laeq measurements:**

**One:** places, such as Ealing or Teddington, which only get aircraft on easterly take-offs but when they do get the planes, they get a lot of them. There would be merit in drawing up contours simply covering the days when they get planes (typically about 27% of any year).

**Two:** places, such as Camberwell and Brockley in SE London or Leyton in NE, are outside the 55Lden contour but generate a significant number of complaints. There is a belief, backed it would appear from historical data, that there has been a concentration of flights over particular areas in recent years. The disturbance in these places has not so far been picked up by the Commission's analysis.

**Three:** areas which get noise from both Heathrow and City aircraft. At present the noise contours for each airport are drawn up separately. They also need to be combined. That is the way people experience noise. Using the Lden metric, 12,200 are impacted by noise from City airport – second only to Heathrow in the South East.

We would suggest:

- Flight path maps are assessed over a 10 year period to see if concentration has been taking place;
- An assessment of noise is made using the 50Laeq metric. (It would also obviously capture areas west of the airport). This is the point where the World Health Organisation argues the onset of ‘moderate’ community annoyance starts to kick in. It is also in line with one of the recommendations of the recent report by the All Party Parliamentary Group on Heathrow and the Wider Economy: <http://www.zacgoldsmith.com/wp-content/uploads/2014/12/Heathrow-APPG-Noise-Report-18-Dec.pdf>
- there is an answerable case for work to be done which draws up combined noise contours.

**These pieces of work are essential if the Commission is to get a comprehensive picture of the noise disturbance at present. That, in turn provides it with a much firmer base from which to propose and assess measures to reduce and mitigate noise.**

## **2. Measures to reduce or mitigate noise**

HACAN welcomes the measures proposed to reduce or mitigate noise: less noisy aircraft; improved operational procedures, principally steeper landings and take-offs; more generous compensation and mitigation packages; and respite periods. **In our view, respite is the key.** Over the past 20 or so years it has been the increase in aircraft numbers which has been the principal cause of annoyance and disturbance. A third runway would add around another 240,000 flights a year. It is respite, and respite alone, which has the potential to reduce the number of aircraft flying over any particular community. HACAN has worked closely with Heathrow and other sectors of the aviation industry in recent years to try to develop respite proposals which work both for the industry and for residents.

In practice, meaningful respite periods will not be easy to put into place at an airport the size of Heathrow. Respite should be based on the following principles:

- Each overflowed community\* should get a period of respite;
- No community should get less respite than it does at present;
- No community should experience a significant rise in aircraft numbers;
- The needs of people near 2 or more flight paths and disturbed by them need to be factored in.
- Take-off routes should be varied within any Noise Preferential Routes

Heathrow Airport has argued that 95% of residents could be guaranteed respite at least 50% of the time. That is a target worth aiming for.

As Heathrow has broken promises in the past, we would suggest the respite proposals should be subject to legally binding targets.

\* see mitigation section – 4b.

### 3. Night Flights

We note with interest the public comments made by Jock Lowe, one of the promoters of the Heathrow Hub scheme, that night flights before 6am could and, in his view, should come to an end if a third runway were to be built as the new runway would provide the capacity to fit in the pre-6am flights at other times. HACAN's well-known view is that the end of night flights should not be dependent on a third runway. However, we would like the Commission to ask the promoters of the two Heathrow schemes to come up with practical proposals which could end pre-6am flights should their scheme go ahead. But 6am is still, for most people, very early! The majority of people, given the choice, are still asleep at that time whereas this is unlikely to be the case by 7am: <http://www.sleepcouncil.org.uk/wp-content/uploads/2013/02/The-Great-British-Bedtime-Report.pdf> We, therefore, would suggest that the Commission also assesses or asks the scheme promoters to assess what scope a third runway would provide to reduce/eliminate flights a) between 6 and 6.30am and b) between 6.30 and 7am. We recognise that ending flights between 6am and 7am would be more challenging so any difficulties in dealing with that hour should not be allowed to interfere with the case for banning flights pre-6am.

#### 4a. Compensation

Heathrow Airport's offer to buy not just the properties which will need to be knocked down to make way for a third runway but also another 3,000 plus properties (if people want to sell) where noise levels would be very high is above what they are statutorily required to do. The offer - the price of the house, plus 25%, plus removal costs and stamp duty - also exceeds their statutory duty.

**However, the key question is whether people will be able to afford a similar property in an area reasonably close by.** We suggest the Commission recommends that this should be factored into any offer the airport is required to make.

There are two other areas where further information is required:

- It is not clear what proposals there are, if any, to assist people who rent in the impacted areas.
- A more detailed assessment is needed of the impact of a new runway on the parts of West Drayton immediately north of the M4. This is a heavily-populated area which would be parallel to the new runway (so not overflowed) but close enough for aircraft using the runway to have a real impact.

#### 4b. Mitigation

There may be some communities where the amount of respite that is feasible may be limited. Typically, these are areas under last few miles of the landing flight path and those places very close to the airport under the take-off routes. These are the areas where the most generous mitigation packages should apply. At present, homes in Cranford, because of their proximity to the airport, receive a comprehensive package of mitigation. We would like to see that sort of package offered to all areas which might get limited respite. This would include households between runways who might be disturbed by noise from both the runways.

### 5. Air Pollution

We welcome the fact that the Commission is doing more work on air pollution. We would like to see people being given the opportunity to comment on this further work prior to the publication of the Commission's final report.

## 6. The Independent Noise Regulator

We support the establishment of an independent noise regulator. HACAN has been working with business, the aviation industry and the local authorities to try to assess the role a regulator might have. It is still work in progress so the thoughts here are simply those of HACAN.

It would be essential that the Noise Regulator was independent, and seen to be independent – independent of government, of the aviation industry, of local authorities and of NGOs/community organizations. Only then would it have credibility.

- it would not be a policy-making body; policy would remain with the Government.
- it would not have powers to fine airlines or airports
- it would not carry out major pieces of research or noise surveys: that work is well done by the CAA
- its primary role would be in more practical matters: for example, are noise or flight path consultations being carried out fairly; are local communities being given sufficient and clear information about noise; are flight paths being used in the best possible way to reduce the noise burden on affected communities; is best practice being followed in all areas?
- but the Noise Regulator should not just be a ‘crisis-management’ body. Its main role should be to help establish a framework for noise management which is rooted in best-practice and which brings an element of certainty to the airlines and reassurance to the local communities
- In short, the Noise Regulator needs to have functions which airlines, airports, community organizations, local authorities, the CAA and Government all feel aids them in their work. It might need to start with relatively few roles, taking on additional tasks as the stakeholders begin to feel comfortable with its role.

**We see it as a small, flexible body** – possibly three people, probably part-time, each with different skills and from complimentary backgrounds, served by a small secretariat.

## 7. Calculating economic benefits

We welcome the fact that the Commission intends to carry out further work on the carbon costs of each scheme (para 2.42). Ideally, we would like to see this published before the General Election so that politicians go into the election with a more accurate range of the economic benefits and costs arising from expansion.



### Postscript: an abuse of the process

HACAN remains opposed to a new runway but we have resisted reiterating all our reasons as this clearly was not the point of this consultation.

Equally, we have resisted organizing a mass mailing campaign. We could have done so, but chose not to because we believe it is an abuse of the process.

The purpose of this consultation was clear: the Commission invited comments on how well it had assessed the short-listed schemes and whether any further work needed to be done.

We have responded to that invitation. We are disappointed that lobby groups such as Back Heathrow have, chosen to abuse the process and flooded the Commission with thousands of pro-forma responses.

[REDACTED]

[info@hacan.org.uk](mailto:info@hacan.org.uk); [www.hacan.org.uk](http://www.hacan.org.uk)