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APPG Heathrow Noise Inquiry

Evidence from LAANC

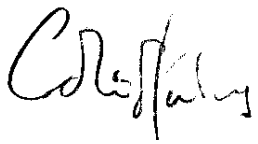
LAANC is an umbrella local authority organisation that represents the views of around member 16 local authorities affected by noise from Heathrow Airport.

Our organization was established in the late 1970s in response to increasing concerns about the impact of aircraft noise on communities around Heathrow Airport.

LAANC is grateful to the APPG both the opportunity to attend the first session of the group on the 16th July 2014 to give oral evidence and also for this opportunity to provide further detail by way of written response to the questions the group has raised.

Our responses are set out below:

Yours sincerely,



Director

APPG Heathrow Noise Inquiry

Evidence from Local Authorities' Aircraft Noise Council

A. The recent and future trends in air traffic noise levels at Heathrow to 2025

1. By what margin - in terms of the number of people affected - does the present noise from Heathrow's existing flight paths exceed the World Health Organisation's community noise guideline values in the day/evening period (0700-2300) and in the night period (2300-0700)? How does this compare with other airports within the UK and the EU?

Answer to Question 1

The original WHO Guidelines for Community Noise were published in 1995, these set out recommended maximum noise exposure levels for all forms of Transport related noise.

Separate recommended target levels for day and night noise exposure are given by WHO. The target levels although often referred to by government as a "gold standard" but they are nevertheless health based targets derived by an expert peer reviewed organisation. The guidelines are designed to protect not only the "average" population but also vulnerable groups.

Although the UK Government adopted the WHO guidelines in 2002 there have been a number of "policy qualifications" since this time which have resulted in the guidelines being set as long term goals.

Current UK government policy on WHO standards is contained within the 2004 London Airports Night Noise Restrictions Consultation 2004 (Stage 1). In July 2004 by the Department for Transport gave a commitment to achieve the WHO guideline values for night flights by 2030.

There has been no recent confirmation of this policy in the latest Heathrow Night flights consultation or decision. There is therefore some concern that even this partial commitment to achieving WHO guideline levels by 2030 has been dropped. We therefore urge the APPG to seek answers from ministers on this point.

Daytime Noise

The World Health Organisation (WHO) says that "during daytime, few people are highly annoyed at LAeq levels below 55dB(A) and few are moderately annoyed at levels below 50dB(A)."

The WHO in setting out it guideline values states that it is important to realise that the above values relate to "steady continuous" noise (such as motorways). Lower noise levels are required for intermittent noise, such as from aircraft events. WHO makes clear that if the noise is intermittent, number of events and the single event noise level (LAmax) are important and should be considered by policymakers.

By inference, the WHO guidelines mean that moderate annoyance starts where air noise (averaged over a 16 hour day) is computed to be 50dB(A). High levels of annoyance are reported where air noise, similarly computed, is found to be 55dB(A) or more.

The UK government by contrast relies on the results of a 35 year old social survey undertaken around Heathrow to claim that the onset of significant community annoyance is 57dB(A). A more recent study undertaken by the UK government and published in 2007 – The ANASE Study, however confirmed that the onset of community annoyance from air noise in the UK is now probably quite well aligned with the WHO target of 50dB(A). Regrettably the UK government decided to reject the findings of the ANASE study.

We are not aware of any studies that have been commissioned either by the DfT or the airports commission to establish the margin of exceedance in terms of populations exposed or contour area enclosed at the WHO standard of 50dB(A) 16 hr, however by reference to the latest WHO Night Noise Guidelines for Europe (2009) we believe at least a million people would fall into this contour band.

In terms of the 55dB(A) standard, the level of exceedance can be approximately determined from a CAA publication "ERCD 1204" which sets out a number of data sets required to be provided to the EU under Noise Mapping Directive 2002 /49 /EC.

The CAA report sets out year 2011 strategic noise maps using its own ANCON noise prediction model in conformance with the requirements of the *Environmental Noise (England) Regulations 2006*. The report sets out noise contours and population data around Heathrow for a number of indicators including Lday (16 hr day average noise levels from aircraft noise). Table A5 shows that around **449,000 persons** are exposed to 55dB(A) or more around Heathrow.

Night time Noise

WHO guidance sets an interim maximum target for noise levels of 55dB(A)Lnight oustside (8 hour 23:00 – 07:00) and a long-term maximum target of 40dB(A) Lnight outside.

WHO advise that its 40 dB(A) Lnight, outside, should be considered a health-based limit value necessary to protect the public, including most of the vulnerable groups such as children, the chronically ill and the elderly, from the adverse health effects of night noise.

The interim target (IT) of 55 dB Lnight, outside is only recommended in the situations where the achievement of the 40 dB standard is not feasible in the short run for various reasons. It should be emphasized that it is not a health-based limit value by itself. Vulnerable groups cannot be protected at this level. Therefore, it should be considered only as a feasibility-based intermediate target which can be temporarily considered by policy-makers for exceptional local situations.

So far as we are aware the neither the DfT, Defra or the airports commission has published any evaluation of the numbers of persons affected at 40dB(A)L night around Heathrow. The WHO 2009 night noise guidelines give some information however of the number of persons around Heathrow exposed to noise levels of 45dB(A) for 2006.

An extract of this table is given below from which it can be seen that over 477,000 inhabitants were exposed to night time noise levels of 45dB(A).

Notwithstanding the obvious differences between these two countries, the data show a remarkable similarity.

A first result of the END (see Table 1.6) comes from a study into night regulations for (large) airports (Wubben and Busink, 2004).

Airport	Number of inhabitants	Number of night operations per year	Night operations as percentage of daytime operations
Amsterdam	21 863	23 462	5.8%
Frankfurt	134 651	46 662	10.1%
London	477 289	26 465	5.7%
Paris	180 184	51 683	10.3%

Table 1.6
Number of inhabitants within 45 L_{night} contour

Although the 2011 contours have shown improvement since 2006 in terms of the size of the night time contour around Heathrow (typically 12%), it can be expected that around 400.000 people are still exposed to noise levels of 45dB(A)L night.

It is also important to note that the "improvement" in noise contours between 2006 and 2011 was nearly all related to a reduction in contour area to the west of the airport, reflecting the improved take off noise performance of more modern aircraft types . There was virtually no improvement for all intents and purpose for communities in south west London under the arrival flight paths

In terms of the margin of exceedance for the WHO 55dB(A) Lnight interim standard, reference to ERCD report 1204 shows that in 2011 around **295,000 people** around Heathrow were exposed to night noise levels at or above 55dB(A).

The UK government currently ignores in terms of policy, the fact that the WHO guidelines set out recommended levels for "single events" at night (the standard is 45dBLAmax within bedrooms). The single event level guidelines are designed to preserve sleep and the ill health effects of noise. WHO also recommends that citizens should be able to sleep with bedroom windows opens for ventilation if they wish. Allowing 15 dB(A) attenuation for a part open window this effectively means that single event noise levels should not exceed 60dB(LAmax) externally. The 2009 WHO Night Noise Guidelines for Europe do however assume an inside to out attenuation for part open window 21dB(A). This has the effect of slightly raising the "acceptable" outside noise levels to around 65dB(A). However some caution needs to be afforded with this substitution as in England it has been government policy to take the attenuation afforded by a part open window to be around 15dB(A).

The last UK aircraft noise sleep disturbance study undertaken in 1992 (FS92) showed that aircraft landing at Heathrow exceed 60 / 65dB(A) max by a significant margin even as far away as Richmond, Putney, Wandsworth and Clapham. To the east of the airport residents of Ealing are regularly subjected to single event levels in excess of 70dB(A)Lmax after 23:00 when flights scheduled to depart in the daytime are permitted depart late. Similarly under easterly operations residents of Windsor, Old Windsor and surrounding parishes all suffer from noise in excess of the 60/65dB(LAmax outside) WHO guideline level as a result of Heathrow early morning arrivals.

The UK government has not undertaken any official update to the 1983 sleep disturbance study but what we do know is that the Heathrow fleet operating between 04:30 and 06:00 has not markedly changed in terms of landing noise performance since then and very little has been achieved by way of noise reduction at Heathrow in 20 years of night restrictions.

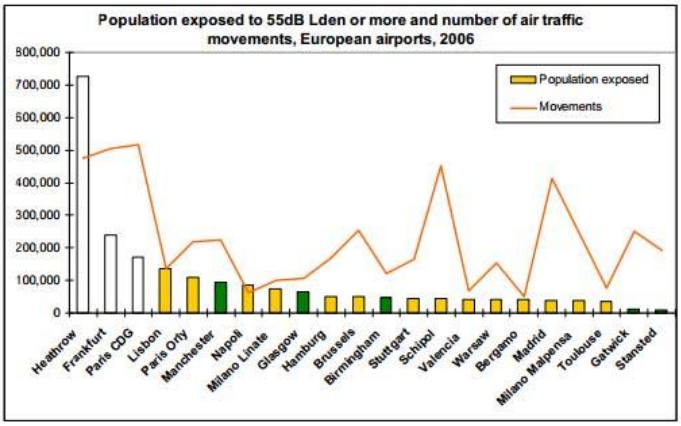
It is also the case, even with the most optimistic of fleet renewal projections into 2030 and 2040, that landing noise is not expected to be cut significantly from that experienced today.

The UK Government's night time policy benchmark standard at Heathrow – the 48dB(A) contour (6.5hour) has no scientific health based evidence to underpin or support its use. It is based upon averaging noise emission over the 6.5 hours which covers what is known as the Night Quota Period (23:30 to 06:00hrs). Virtually all of the scheduled NQP movements at Heathrow occur in the 04:30 to 06:00 period. The effect of stretching the averaging period from 90 minutes to 6.5 hours is to significantly underestimate the size of the contour area as well as population numbers affected during the actual period of noise events from 04:30 to 06:00. In LAANC's view, averaging noise over 6.5hrs when it only occurs in 1.5 hrs is an abuse of the scientific principals behind the calculation.

Comparisons with Other Airports

By any measure, it is clear Heathrow has the largest adverse noise impact on people compared to any other EU hub airport The DfT's own Draft Aviation Policy Framework document (2102) provided the evidence for this. This shows by reference to the preferred EU Lden noise metric how Heathrow's noise impact easily exceeds the combined impact of all other hub airports in Western Europe. For ease of reference section 4.5 of this document is reproduced below

4.5 Whilst noise is a concern at all airports, Heathrow Airport accounts for approximately 70 per cent of people in the UK exposed to average noise from airports above 55 decibels.[80] More than one in four people exposed to this level of noise around European airports lives near Heathrow.[81] In fact, by this measure, Heathrow's noise impact easily exceeds the combined impact of all the other hub airports in Western Europe,[82] despite each having approximately similar numbers of movements.[83]



4.6 Comparing numbers of movements to population exposed to noise, it is evident that Heathrow has a significantly greater noise impact per flight than any other major European airport.

2. Does the Environmental Noise Directive enable the UK to meet fully the criticisms that were made in the Heathrow Terminal Five Public Inquiry Report that the 57 decibel noise contour was by itself an inadequate measure for assessing the full impact of air traffic noise?

Answer to Question 2

In our view the END does not fully meet the criticisms that were made by the T5 inspector. For ease of reference the two main criticisms of the T5 Inspector (Roy Vandermeer QC) as stated in his main report at paragraph 34.4.42 are reproduced below:

"The measure of the noise climate used by the Government to test the success of its policy is the LAeq,16hour index. This was the subject of severe criticism much of which I consider to be well-founded.

..... It does not reflect the operation of runway alternation which is a key feature of Heathrow (para 21.3.30) nor does it give any indication of the number of times activities are interrupted by passing aircraft (para 21.3.31).

.....More significantly I believe that it fails to give adequate weight to the number of aircraft movements (para 21.3.34). Many local residents are unconvinced by the Government's argument that the noise climate has improved. They believe that it has become worse over the last 5-10 years and this appears to be a reflection of the substantial increase in movements over that period (para 21.3.34)."

Although the END recognizes the increased sensitivity of populations exposed during the evening and night periods the prescribed END noise metrics Lden and Lnight are based on the Leq index which averages noise across both runways and between westerly and easterly operations of the airport. In doing so the resultant noise contours at Heathrow do not accurately reflect the levels of noise that people actually hear and consequently the way they are disturbed. The leq principle assumes community annoyance levels will remain the same even if the aircraft operations are doubled, providing the noise energy emitted from individual aircraft events is halved. A halving of

noise energy equates to a 3dB reduction. Although a halving of noise energy sounds impressive it is for most people a barely perceptible change in perceived noise.

There is evidence from work undertaken by the "ANASE" research team as part of its UK study in 2007 that above a certain number of aircraft movements the leq principle becomes uncalibrated and from then on annoyance reaction becomes triggered more by numbers of movements which are heard rather than the individual noise levels of each event. We urge the APPG to seek further evidence on this point.

In our view there is evidence to support a hypothesis which says that the point at which people become annoyed by aircraft has shifted over 35 years. The ANASE report found that over the last 30 years or so levels of reported annoyance, in terms of percentages of the population annoyed, formerly at around 57 decibels were now being reported at 50 decibels.

In our response to the Aviation Policy Framework consultation LAANC submitted a technical review (Author: Mike Rickaby) which highlighted concerns on this issue. The paper examined the differing aircraft annoyance studies across the EU including the findings of a European Environment Agency (EEA) 2010 report. The technical paper was submitted to the DfT to help policymakers understand the need at an early stage to reconsider the UK approach of judging annoyance caused by aircraft noise by reference to the 57decibel contour. The paper also shows how the findings of UK's ANASE 2007 study are in retrospect well aligned with other recent EU studies on aircraft noise and annoyance.

The paper concluded that both the EEA report and the ANASE study showed that there had been a significant shift in terms of peoples' attitudes to aircraft noise and that this now caused annoyance at lower levels than it did previously, as found in the older ANIS study.

A copy of this paper Is annexed to this response and the group is welcome to use it in any way that it finds useful.

We believe The Airports Commission has similarly failed to get to grips with the key issue that it is unacceptable to continue with a metric that suggests peoples' attitudes remain the same some 30 years later and with a doubling of flight numbers.

In terms of ensuring all noise impacts are adequately quantified, it should be noted that the use of either the L_{eq} metric or the L_{den} as adopted by the EEA still suffer from a number of deficiencies. As both are based upon average conditions, they mask the effect of runway alternation. They do not indicate the maximum noise of individual events and therefore cannot account for the number of times activities, e.g. school lessons, are interrupted. Both also fail to give adequate weight to the number of aircraft movements. However, whilst these issues remain to be resolved, what is clear is that aircraft noise now causes annoyance at lower levels than previously found 30 years ago and that this issue must be addressed. As an interim measure the $55L_{den}$ adopted by the EU may represent a more realistic measure of community annoyance than the 57decibel contour used by the government.

If the Parliamentary Group finds our evidence persuasive, we would welcome its support to urge the Government to make its decisions on the extent of community impacts based on sound science and accounting for all the differing noise impacts. This is essential if the impacts are to be properly mitigated. There should also be an aim to correlate future noise metrics with the WHO guidelines for the protection of health of the most vulnerable in society.

3. What are the prospects for significantly less noisy aircraft at Heathrow over the next ten years and are the prospects in any way dependent on the development of the proposed third runway? To what extent is there a conflict between the optimum reduction of aircraft noise and carbon emissions?

Answer to Question 3.

LAANC believes that predictions made by Heathrow Airport in terms of the noise performance of its future fleet are over-optimistic in terms of landing noise performance. It is also the case that since the retirement of Concorde

just 10 years ago there has been no step change in reduction of noise around Heathrow in terms of population affected within the government's 57dB contour area – the numbers remain at around 240,000 citizens.

The CAA, the UK independent aviation regulator, says that while it believes aircraft will become quieter, it is less confident than Heathrow Airport about how quickly the new generation planes will be introduced. Its recent report "Managing Aviation Noise" the CAA reports that "Introducing new aircraft types is a slow and typically cyclical process that can be fraught with delays and issues, as recent experience with the introduction of both Airbus and Boeing's new models, the A380 and 787, has shown.

The CAA report also notes that hundreds of the aircraft types would need to be removed by 2025/6 if Heathrow Airport were to meet its target.

We would also caution that on current evidence from the CAA, improved noise performance of new and next generation aircraft may not be achieved on arrivals (see CAA reports ERCD 1106 - for Airbus A380 aircraft and CAP 1191 for the Boeing 787). Our concerns are also shared by Transport for London who quote specific data. TFL say "An older Boeing 747-400 has an LAmax (single event noise impact) when arriving at 1,000 ft of 86dB. An Airbus A380 has an LAmax arriving at 1,000 ft of 85dB.

A 1dB(A) difference in terms of a single event level would not be perceptible on the ground.

The consequence of using over-optimistic assumptions for future aircraft efficiency in terms of noise and emissions reductions is that they are translated without question or sensitivity testing into future predictions of community impacts by policymakers. If these projected improvements do not translate to actual in service noise levels, this will result an increased environmental burden and social impact upon the local communities. We believe that if aircraft fleet assumptions were to be subjected to a critical independent peer review process, this would go some way to gaining confidence in what the future noise climate is actually likely to be in terms of community impact. It would be helpful if the Parliamentary Group could investigate this option.

With regard to the future priorities between designing for noise reduction or for emission reduction we would refer the Parliamentary Group to the CAA Managing Aviation Noise report. This suggests that concerns over climate change and local air quality could increase the likelihood of trading off designing for emission reductions against improved noise performance. (page 30). More evidence is needed to clarify this and to ensure that this is appropriately factored into the future fleet assumptions.

4. Are there additional operational procedures for noise reduction and respite at Heathrow that could be introduced within the next ten years; or are any such noise improvements being held back for the development of a third runway?

Answer to Question 4.

The CAA Managing Aviation Noise report suggests that issues such as a later deployment of landing gear and reduced landing flap setting (page 38, 39) could result in reductions in the noise experienced by the overflown local communities. These two measures could be investigated for early implementation because they do not appear to be linked to a need for an increase in runway capacity.

The use of steeper glideslopes is said to be possible both on the existing runways as well as any new runway by 2030 (Heathrow Airport Noise submission – AMEC report - para 4.3.2). Again this does not appear to be linked to a need for an increase in runway capacity. However we would caution about the real world effectiveness of these changes. In respect of increased angle of descent the CAA advise in its recent 2014 Managing Aviation Noise report

" *the additional benefits of 3.2 degree approaches are relatively small" and "even 3.2 degrees could interfere with the ability to use low power/low drag and reduced landing flap techniques*" (page 43)

The use of displaced runway thresholds for noise reduction is associated with the provision of a new runway (HAL noise submission, paragraph 4.2.2). Existing runways are said to "*require significant modifications*", such as new taxiways, to enable significant displacement of the thresholds. It is presumed that this will only occur as a noise reduction measure if the airport is granted expansion.

If the measures that have formed the basis of future noise modeling undertaken by Heathrow Airport to do not deliver the reductions as assumed or have knock on detrimental impacts on other issues such as local air quality, it will be the local communities who bear the brunt of the ensuing detrimental impacts. It would be helpful if the Parliamentary Group could investigate the extent to which the claimed reductions in noise contained in the HAL submission are likely to be translated into real world perceived noise reductions on the ground.

We do not believe that the introduction of quieter planes is not dependent on a third runway.

B. Impact of the proposed third runway on air traffic noise levels after 2025

5. Over what areas will the arrival and departure flight paths for the proposed third runway be routed, and which of those areas are not currently overflown by Heathrow air traffic, either at all or only occasionally?

Answer to Question 5.

The flight paths shown within the HAL noise submission are unfortunately in insufficient detail to enable us to properly identify our potentially impacted communities. In regards to the question as to whether it will create new areas exposed to aircraft noise, we can only assume that the north-west runway option will require new flight paths and hence expose totally new areas and populations to aviation noise. The impact on communities away from the immediate vicinity of the airport has historically been disregarded, particularly where aircraft are at heights of around 5000ft or more, however it is the case that with over 250,000 extra flights a year to be accommodated communities 20km or more from Heathrow are likely to experience regular over flights that will be clearly audible. LAANC is aware already that to the south of Heathrow, residents of Epsom and Ewell and LB Sutton for example complain about the impact of Heathrow flights, particularly in the late evening when departing aircraft use the Dover departure route and in the early morning when flights arrive over these areas from 04:40 onwards. The low background noise that characterizes these outlying areas accentuates the perceived annoyance from aircraft noise.

The HAL north-west runway submission includes a proposal for night flights runway rotation which if implemented would then also subject new communities to night noise.

We are aware of the recent briefing from HACAN (Third Runway's Flight Paths). This notes that with a third runway in place, there would need to be 250,000 more planes to accommodate on the different flight paths. Communities in line with the new third runway will be experiencing planes overhead every 90 seconds between 6am and 11pm with a break of only just over 4 hours. It should be remembered that even under the current two runway system at Heathrow "respite" does not mean freedom from hearing aircraft for some communities under the arrival flightpaths.

6. Would the flight paths for the third runway cause any alteration to the present routing of the flight paths for the existing runways; and if so, to what extent?

Answer to Question 6.

We are not experts on this issue. We would suggest that the Parliamentary Group invites NATS to provide clarity on this issue.

However we note that the HAL submission indicates that NATS is confident that a three runway Heathrow will not adversely affect any other airports (HAL noise submission, Appendix C, page C4). It is also clear from advice given by NATS to the Airports Commission for its interim report that in the construction and operation of a 4th runway at Heathrow would effectively prevent Gatwick and London City from continuing to operate.

7. How would the proposed segregated mode respite periods operate with three runways, compared with the existing runway alternation arrangements (between 0700-2300 and 2300-0700)?

Answer to Question 7.

The HACAN briefing paper referred to above indicates that the current respite periods experienced by communities with the existing two runway airport would be substantially reduced. For communities under the two existing flight paths on westerly approach this could mean a reduction from the current half day (8 hours) to just over 4 hours respite. The three runway scenario as described in the HAL submission 4.5 requires the introduction of mixed mode working on both the existing southern runway and the new proposed 3rd runway to the north west. This is despite HAL's previous assertions that it did not wish to introduce mixed mode operations and the airport.

The recent Heathrow Airport submission to the Airports Commission (AMEC report) suggests that the impact of night flights is reduced by rotating the use of all three runways, with each approach used 1 night in 6 thereby providing respite for 5 nights out of 6 (para 4.3.3). However it does need to be recognised that this will then include communities who will be exposed to night noise for the first time.

We are not clear what the health impacts would be of such measures, there has been no social study to investigate community reaction to these. For example, the health impacts associated suffering sleep disturbance 1 night in 6 compared to those associated with loss of respite periods or by being newly exposed to aircraft noise are currently unknown.

Overall LAANC does not believe the HAL submission for a third runway meets the Aviation Policy Framework objective "to limit and where possible reduce the number of people in the UK significantly affected by aircraft noise". (para 3.12) .

8. Would the third runway enable Heathrow to operate without flights in the night period (2300-0700)?

We do not believe that lack of runway capacity drives the need for night flights. These would occur regardless of expansion, as stated in the HAL noise submission "*night flights would continue but there would be no more than today"*(Table 5.1, page 36).

During the T5 inquiry BA claimed it could eliminate all but one of its flights in the Night Quota Period (23:30 to 06:00).
"The additional capacity provided by Terminal 5 together with the use of larger aircraft could double the capacity on South East Asian Services so British Airways current projections showed they would operate either fewer flights in the night quota period if Terminal 5 were built (See paragraph 34 4 48 page 603 "The Heathrow Terminal Five and Associated Public Inquiries - Report by Roy Vandermeer QC Main Report November 2000).

This promise has never been delivered. We would encourage the APPG to ask BA why they remain unwilling to honour this pledge.

We believe that at Heathrow it is possible to remove all scheduled night flights before 06:00. There is experience that can be gleaned from other European hubs airports such as Frankfurt, where night flights have been banned in spite of threats that airlines would move their business. The threatened moves have not materialised.

9. How quickly would Heathrow with the proposed third runway reach its stated capacity of 740 000 aircraft movements (ATMs) per year? In view of the resilience difficulties at Heathrow with 480 000 ATMs (a problem not identified at the Terminal Five Public Inquiry), how much resilience would there be with 740 000 ATMs?

Answer to Question 9.

The Heathrow Airport assessments have been based upon an early phase operation case by year 2030 with 570k movements serving 103mpa; and mature operations considered to be 2040 with 740k movements serving 130mppa. (page 3).

It is not clear if this is the actual theoretical operating capacity of the three runway airport or whether operational resilience has been built into this figure.

The technical assessment (Technical Assessment Ref 62) carried out by the Airports Commission has indicated an opening year of 2026 with the airport reaching 80% capacity by 2030 and 100% by 2050. Again it is not clear whether operational resilience has been built into this figure.

If operational resilience is not built in, then we would see the same issues being repeated as are being faced daily now by an airport operating at around 98% of capacity. The consequences for of failure to provide adequate operational resilience are to a great extent borne by local communities which face daily encroachment into respite periods when the airport attempts to recover operationally from events such as adverse weather conditions. This must be avoided in any future scenarios and the airport movements capped to ensure that this occurs.

We believe it would be helpful to clarify what levels of operational resilience have been built into the HAL and the Airports Commission assessments. Any associated reductions in capacity need to be featured in the economic appraisal of the option.

10. Would the proposed third runway hasten or delay the date by which the air traffic noise levels at Heathrow would not exceed the World Health Organization's guideline values on community noise?

Answer to Question 10.

In our view the construction and operation of third runway at Heathrow can only delay the date by which it might otherwise be possible by 2030 to make progress towards achieving WHO guidelines for community noise.

In our opinion the third runway at Heathrow is also in conflict with the Aviation Policy Framework objective and the National Policy Statement for Noise which seeks "to avoid significant adverse impacts on health and quality of life".

ENDS

LAANC / CS/11/08/2104

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