

# LAANC

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**London Heathrow Airport**  
**Hounslow,**  
**TW6 2GW.**

1<sup>st</sup> August 2011

Dear Sir or Madam,

**Re: Review of Heathrow's noise mitigation schemes: A Heathrow Airport consultation 9 May to 1 August 2011**

This response is submitted by the Local Authorities' Aircraft Noise Council (LAANC) on behalf of two dozen Local Councils comprising Boroughs, Unitary Boroughs, London Boroughs, County and Parish Councils serving a wide area around Heathrow Airport. The Constitution of LAANC covers environmental issues as well as noise and represents a very large community many of whom have direct contacts with Heathrow.

The following responses were discussed and endorsed at the last meeting of LAANC Executive Committee on 8<sup>th</sup> July 2011.

Our responses are all referenced to the relevant section in the consultation. So far as is possible our comments respond to the questions set out on the pro/forma response but it has not been possible to reply solely using this as there was inadequate space to do so.

**Summary Observations and Comments**

(i) LAANC welcomes the publication of the Heathrow Airport Noise Action Plan and agrees that it is timely to review baseline so far as noise insulation schemes are concerned. LAANC supports the adoption of the EU 55dB L<sub>den</sub> noise contour as a reasonable surrogate for delineating the area around Heathrow that represents the onset of significant community annoyance.

(ii) LAANC does not believe that the proposals provide either appropriate mitigation or compensation in the spirit outlined by The Secretary of State who in confirming the decision of the previous administration to abandon the Cranford agreement stated

*“I will look to BAA to ensure that proper consideration is given to appropriate mitigation and compensation measures for those likely to be affected by the proposals. (7th September 2010)*

The consultation does not in fact contain any proposals for offers of compensation to the residents of Longford and Harlington who have bought their properties in with the hitherto assurance that aircraft departures from runway 09L would not be permitted routinely due to the protection offered to them by the Cranford agreement.

The consultation is similarly silent on proposals / standards for ground noise. The most recent BAA development at Stansted offered the provision acoustic insulation for all properties within 600m of the operational areas of the airport. A similar or better offer should be made to communities who will be newly exposed to ground noise following the abolition of Cranford agreement. LAANC is disappointed for example that the proposals contain no commitment to provide acoustic bunds to protect the communities that will be newly and most seriously disadvantaged by regular take offs to the East from runway 09L.

The position for many of the residents of these communities is that had they known that the Cranford agreement would be broken it may have influenced their decision to buy in the area. In the circumstances it is likely that the value of a number of the worst affected properties will be reduced by the increased noise levels to which they will be routinely exposed, once full runway alternation is established. LAANC believes that BAA should financially compensate this group of residents to cover the increased noise disturbance and reduced property values.

(iii) The proposed qualification for being entitled to a noise insulation package is based upon annual average air noise contours values. In LAANC’s view the proposed qualification levels are too high and do not take into account recent dose response studies to aircraft noise conducted either in the UK or elsewhere in the EU.

LAANC believes that the consultation document misrepresents government policy on the provision of noise insulation grants. The current government has not pronounced on this issue and the suggestion at paragraph 2.2 of the main consultation that the 69dBL<sub>Aeq16 hr</sub> noise contour is the recommended level for community protection is false. In fact the previous administration made a number of pronouncements on the question of to what levels airport operators were expected to mitigate the air noise effects of their operations. For example: The Government decision document “Adding Capacity at Heathrow: Decisions Following Consultation” of 2009 stated:

*“The Secretary of State is asking the airport operator, in reviewing its existing insulation and mitigation schemes, to consider extending its noise insulation schemes to all community buildings and households in the new 57dBA contour who will experience an increase in noise of 3dBA or more.....”*

Recent EU research<sup>1</sup> confirms that at levels of 55dBL<sub>den</sub> ( which at Heathrow approximates to the 57dBL<sub>Aeq 16 hour</sub> contour ) level some 28% of people are still seriously annoyed by aircraft noise. These data are in line with the most recent UK studies (ANASE). At Heathrow the 57 L<sub>Aeq (16 hr)</sub> contour approximates to the 59dBL<sub>den</sub> contour at any given point around the airport.

Based on this guidance it is LAANC’s view that the 55dB L<sub>den</sub> noise contour should be the principal threshold for noise insulation / compensation for air noise. The BAA noise action plan is based on the (2006) 55dBL<sub>den</sub> contour. LAANC’s view is that a

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<sup>1</sup> European Environment Agency Technical Report No.11/2010 “Good practice guide on noise exposure and potential health effects”

new residential noise insulation scheme should be based on this contour with the worst affected communities being provided with mitigation first.

LAANC is also of the view that in terms of averaged noise levels (16 hour leq and /or 24 hr  $L_{den}$ ) a 1dB increase is significant. On a like for like basis a 1dB increase over the 16 hour day period represents a 26% increase in ATMS. LAANC believes that a 1dB increase in  $dBL_{den}$  due to the abolition of the Cranford agreement should therefore trigger entitlement to mitigation / compensation. This is comparable in concept to mitigation measures enshrined by statute when highways are constructed / improved. The loss of the Cranford Agreement should attract compensation for loss of amenity.

### Response to Detailed Questions

**Q2: Are you in favour of our proposal to set the scheme outer boundary at the 63Lden noise contour? (chapter 2, paragraphs 2.8-2.11 - Main document).**

No.

LAANC does not believe that the 63dB  $L_{den}$  noise contour represents any particular criteria for annoyance or health.

The most recent dose / response studies undertaken in the EU have reported that 27% of the population within a 55dB  $L_{den}$  aircraft noise contour are “highly annoyed” On this basis the airport operator should accept that Heathrow airport causes widespread annoyance and disruption across large areas of London Surrey and Berkshire.

It is LAANC’s view that the 55dB  $L_{den}$  noise contour should be the “qualification threshold” for noise insulation / compensation for air noise.

Heathrow is the busiest international airport in the world and has one of the highest population densities in its surrounding area. However a review of other UK airports reveals that it is one of the least generous.

For example schemes such as those at Birmingham, Liverpool and Robin Hood (Doncaster) airports are based on the 63 dB  $L_{Aeq(16h)}$  contour. The scheme at London City airport is based on the 57 dB  $L_{Aeq(16h)}$  contour.

**Q3: *Are you in favour of our proposal to introduce a zoning structure, where households experiencing the highest aircraft noise impacts are eligible for the full noise mitigation offer?* (Main document reference: chapter 2, paragraphs 2.12-2.16.**

LAANC believes that the responsible position for the airport operator to adopt is to fully fund the cost of mitigating the adverse impacts of its activities on its neighbours.

LAANC would only be prepared to support proposals to introduce a zoned structure if the overall effect would be to fund an increase in the number of people who are currently eligible for insulation. For example this could work as part of phased programme of insulation within the 55dB  $L_{den}$  contour. LAANC does not believe a 25% contribution band is equitable, this should be incorporated into the 50% band.

The “zone 2”, 50% band in our scenario could apply between 55 to 60dB  $L_{den}$ .

LAANC would expect residents adversely affected by the revocation of the Cranford Agreement to be eligible for 100% of the cost of insulation.

**Q4: Do you think that residents in Zone 1 should be the first to receive noise mitigation under the Residential Noise Insulation Scheme? (Main document reference: chapter 2, paragraph 2.23).**

Without prejudice to our answer in question 3, LAANC would like to see communities who suffer the worst air noise disturbance receive noise mitigation / compensation first, particularly those people living directly under a flight path and people living in Cranford.

**Q5: Do you think that for our existing noise mitigation schemes the range of products offered, quality and workmanship of the products, and follow up service has been of an acceptable standard? (Main document reference: chapter 3, paragraph 3.1).**

LAANC has not received any adverse reports regarding the quality of the products and service provided by BAA and/ or their preferred suppliers under the existing mitigation scheme.

LAANC would however like to see greater flexibility built into future schemes, especially in terms of choice of product. The current "one size fits all" range of noise insulation unfairly prevents residents of historic or listed buildings from taking up what would otherwise be their grant entitlement for insulation.

On a purely technical matter LAANC would like to see post installation sound insulation testing undertaken on random samples of both residential and community buildings which have received grant supported upgrades. The work should also be subject to review and inspection 10 years after the installation has taken place.

The results of this to be reported to the Heathrow Community Noise Insulation Board and Track Keeping working group and or / the HACC.

**Q6: Are you in favour of our proposal to continue with the existing Night Noise Insulation Scheme until the end of the current night noise control regime in 2012/13? (Main document reference: chapter 3, paragraph 3.2)**

Recent scientific studies are adding further support to the hypothesis that noise at night with regular prolonged sleep deprivation and disrupted sleep patterns has serious health implications, these include risk of heart disease/ stroke; high blood pressure and cholesterol; diabetes and obesity.

Night noise from aircraft is the biggest cause of community disturbance and annoyance from Heathrow airport. LAANC continues to call for a night curfew at Heathrow between the hours of 11pm to 7 am emergencies excepted.

In the event that the proposed scheme is amended to incorporate the 55dB L<sub>den</sub> contour as representing the threshold for grant entitlement LAANC believes the existing night noise scheme should continue until a new night noise regime is announced to cover the period 2012 onwards.

If the request for a 55dBLden overall qualification is not accepted then LAANC would urge that a further night noise insulation scheme be introduced. This should be based on the most up to date health related research and give due consideration to the precautionary principle.

**Q7: Are you in favour of our proposal to extend both the geographical area in which the Community Buildings Noise Insulation Scheme will operate, and also what is offered under this scheme? (Main document reference: chapter 3, paragraph 3.3).**

Recent studies have confirmed that exposure to aircraft noise during the school day impairs cognitive development in children. Reading comprehension is particularly adversely affected.

LAANC believes that no child attending school should suffer educational deficit due to the fact that they are educated in a school that is affected by aircraft noise. It is therefore necessary to provide appropriate insulation to all educational establishments that are impacted by Heathrow operations.

LAANC also believes that this could be achieved for the most part if the qualification threshold of this scheme were to be set again at 55dB<sub>L<sub>den</sub></sub>. However if a school beyond this contour could demonstrate that its premises were acoustically compromised by aircraft noise then they should also be able to apply for “special case” mitigation.

Adequate compensation for the extra expense of building / refurbishing schools within the Heathrow impacted area should be paid. This should be offered within the overall framework of a new noise insulation scheme<sup>2</sup>.

**Q8: Are you in favour of our proposal to extend the area in which the Home Relocation Assistance Scheme will operate, and also to increase the maximum sum payable in Zone 1 (with a new payment also introduced in Zone 2)?<sup>9</sup>Main document reference: chapter 3, paragraph 3.3.)**

LAANC seeks an improved sound environment at source for communities close to Heathrow. The council wishes to see the desire to leave “under duress” removed. However in circumstances where individuals feel they can no longer tolerate the noise level they are subjected to. LAANC believes that it is the airports operator’s responsibility to provide relocation assistance to the families affected. The basis for this compensation should be the “market rate” set by an independent body.

**Q8: Are you in favour of our proposal to extend the area in which the Home Relocation Assistance Scheme will operate, and also to increase the maximum sum payable in Zone 1 (with a new payment also introduced in Zone 2)?(Main document reference: chapter 3, paragraph 3.3).**

Not as proposed

A number of residents will be worse off under the proposed daytime noise insulation scheme than they are under the current scheme.

Under the proposed residential daytime noise insulation scheme, properties falling outside the boundary of zone 2 (enclosing an area of 26.3 sq km) but inside the 1994 69 dB L<sub>Aeq16h</sub> contour (area of 27.3 sq km) will have their percentage of double-glazing costs met by BAA reduced from 50% to 25%, and their eligibility for free secondary glazing will be lost. BAA propose to deal with the above

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<sup>2</sup> LB Hounslow estimates that 5% of the cost of a new build/refurbishment is due to the expense of noise insulation/ventilation. It is possible that the Borough may wish to revise this figure.

**Q9: Overall, do you believe that our proposals are fair and equitable?**

LAANC is of the view that current noise mitigation scheme is based upon historic benchmarks which are now out of date and do not take into account the results of emerging research on human dose response to noise - including ill health effects.

As stated above the LAANC supports the airport operator's decision to adopt the EU 55dB<sub>L<sub>den</sub></sub> benchmark against which it is to measure the effectiveness of the Heathrow Noise Action Plan. It is therefore disappointing to see that the operator has at this chosen the lowest common denominator approach for this key deliverable.

Overall although LAANC acknowledges that the proposed scheme is more generous than the current it does not support the proposals as being a fair response to the Secretary of State's recent guarantees to adequately protect communities who will otherwise be substantially disadvantaged as a result of noise following the abolition of the Cranford agreement.

Yours sincerely

Cllr Malcolm Beer  
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[www.laanc.org.uk](http://www.laanc.org.uk)