

The London Assembly's consultation response to the Government's draft aviation policy framework

The London Assembly recognises the vital role aviation has to play in the UK's economy and the need to strike a balance between the economic benefits there are to be gained from a dynamic aviation sector, and effectively managing the negative environmental impacts that can result from airport operations. We therefore welcome the Government's commitment to developing a long-term sustainable approach to managing aviation impacts and we are pleased to submit this response to the Government's consultation on its draft Aviation Policy Framework.

The London Assembly's position on expansion

While this response provides comments and views on the national approach it will do so in the context of what it means for Londoners and how the policy approaches outlined in the consultation document might affect them.

The Assembly has consistently opposed proposals for expansion at London Heathrow on the grounds that the negative environmental effects are disproportionate to the estimated benefits an expanded Heathrow would bring to London.¹ In 2003, we opposed the recommendations in the White Paper to expand Heathrow.² We maintained our position in 2005, when the British Aviation Authority produced an interim master plan for how expansion may take shape, raising concerns over the plan's ability to meet air quality targets, to secure greater public transport access to the airport and to limit the impact of the airport on the quality of life for local communities.³ In 2007 we disputed the arguments in support of expansion, outlined in the Department for Transport consultation, *Adding Capacity at Heathrow*, on the basis that we were unconvinced that expansion at Heathrow was essential to the well being of London and the wider UK economy, and that the conditions placed on expansion did not adequately address the local and international environmental costs and impacts it would have.⁴ The Assembly reaffirmed its position this year, unanimously opposing expansion at Heathrow.⁵

Our response to the consultation

This response does not revisit the merits of the argument for increasing capacity in the South East, whether through expansion at Heathrow or at another location, but it sets out what the Assembly believes are valid concerns and considerations that would need to be taken into account in managing the environmental impacts of aviation both now and in the future.

This response will focus on Chapters 3 (Climate change impacts), 4 (Noise and other local environmental impacts) and 5 (Working together) of the consultation document.

¹ See http://www.london.gov.uk/assembly/reports/plansd/heathrow_expansion.pdf

² The White Paper "*The Future of Air Transport*" proposed a "balanced strategy" between airport expansion and the environmental impacts, in line with its "commitment to sustainable development", and concluded that the capacity of UK airports, particularly in southeast England, was "an important constraint on future growth". The White Paper supported runway expansion plans at Heathrow and Stansted airports. The Assembly maintained the position that the aviation industry must meet its environmental and external costs. The response is at <http://www.london.gov.uk/who-runs-london/the-london-assembly/publications/transport/aviation-consultation-response>

³ See <http://www.london.gov.uk/who-runs-london/the-london-assembly/publications/transport/heathrow-expansion>

⁴ <http://www.london.gov.uk/who-runs-london/the-london-assembly/publications/transport/response-governments-consultation-adding-capacity-heathrow-airport>

⁵ Motion passed at 11 July 2012 Assembly plenary meeting. See http://www.london.gov.uk/media/press_releases_london_assembly/assembly-says-no-revival-third-runway-heathrow

We draw on a considerable body of work including previous consultation responses by the Assembly, investigations led by the Assembly's Environment Committee (on the environmental impacts of operations at the London Heathrow and London City airports),⁶ the Health and Environment Committee's recent discussion with an expert panel,⁷ written submissions,⁸ and published research and information.

⁶ *Flights of Fancy: can an expanded Heathrow meet its environmental targets?* January 2010; *Plane Speaking: air and noise pollution around a growing Heathrow Airport*, March 2012 <http://www.london.gov.uk/who-runs-london/the-london-assembly/publications>

⁷ Health and Environment Committee Meeting, 16 October 2012. A transcript of the discussion is available at <http://www.london.gov.uk/moderngov/ieListDocuments.aspx?CId=256&MId=4617>

⁸ Submissions were received from London First and the WWF.

Summary of the response

Climate change

The general approach Meeting the national target to reduce net GHG (greenhouse gas) emissions by at least 80 per cent below the 1990 baseline by 2050, as set out in the Climate Change Act 2008 will be a considerable challenge, requiring a significant curb in the growth of the expected increase in passenger numbers.⁹

The Committee would caution against the emphasis placed on securing international agreement and on the European Emissions Trading System (EU ETS), as currently configured, to achieve the national target. Further improvements and greater uptake of the EU ETS may be needed before it can deliver the desired reduction levels.

A phased approach to reducing aviation emissions is needed, setting out short, medium and long term milestones; we previously recommended that these should be legally binding. We welcome the Committee on Climate Change's advice to Government earlier this year that aviation should also be included in the five-yearly carbon budget system and would urge the Government to take this advice on board.¹⁰

Incentivising to improve aircraft performance The Government should continue to support and encourage technological developments through industry led projects. There is also scope for the Government to incentivise research into and the use of renewable transport fuels, other than biofuels.

Noise and other local environmental impacts

Noise The Assembly welcomes the Government's policy approach and its commitment to establish a framework that incentivises noise reduction and mitigation more strongly, and encourages better engagement and greater transparency between airports and local communities.

The Assembly is concerned with two key aspects of this approach: the measurement used and the threshold that is applied. The 57 dB LAeq contour, the level at which the Government deems individuals become annoyed at noise, does not fully reflect the numbers of people affected by aircraft noise and is inconsistent with EU requirements for drawing up noise action plans. Government should take the opportunity to review the approach to measuring noise levels, and bring it in line with EU requirements.

The Assembly cannot condone the introduction of an operational change that would deny residents such respite from aircraft noise, and have a detrimental impact on their health.

The Assembly would wish to see a strategic approach to noise mapping and consistency in the way in which mitigation and compensation schemes are applied across London. The noise contours for London City Airport and Heathrow Airport are drawn up separately. There is a need for joint contours, as people are increasingly affected by the combined impact of aircraft noise arriving and departing from both these airports. The absence of joint contours completely underestimates the actual noise that is being heard. There is scope for developing joint contours or other indicators, such as flight path density plots, or noise event-based measures, for such areas.

⁹ The level of gross emissions from a particular sector is the actual quantity of emissions emitted by the sector. The net emissions for the sector take account of the emissions allowances or international project credits that it has traded with other sectors

¹⁰ Page 9, Health and Environment Committee transcript 16 October 2012. See also <http://www.theccc.org.uk/carbon-budgets>

Night noise The Assembly welcomes the Government's planned consultation on the arrangements for managing night time flights at Heathrow, Stansted and Gatwick airports later this year, and the inclusion of a review of the costs and benefits of night flights and current literature on aviation night noise health impacts.

Air quality In addition to measures to improve air quality, such as increasing use of greener, quieter aircraft, ensuring on-site vehicles meet the latest EU emissions standards, and reducing airport related road traffic, there are a range of issues that will need to be tackled to improve surface access to Heathrow Airport to encourage greater use of public transport for journeys to and from the airport.

Working together

Airport Consultative Committees The Assembly welcomes the Government's commitment to see ACCs play a more effective role; they provide a useful forum within which to seek input from a wide range of stakeholders. In London we are seeing a growing need for inter-relationship between the Heathrow and London City Airports' consultative committees and consider that there would be merit in enhancing arrangements for inter-airport liaison.

Role of the Civil Aviation Authority (CAA) The Assembly believes that there is scope for an independent body to monitor noise and administer airport mitigation and compensation schemes.

The lack of independent scrutiny of the noise action plans drawn up in the UK, are also a concern. Elsewhere in Europe they are drawn up by an independent third party. Independent administration could help rebuild the trust that has been lost by local communities in how airport operators seek to manage, mitigate and compensate for the negative environmental impacts that can arise from airport operations.

Further research into who might best be placed to carry out this role is needed.

Chapter 3 - Climate change impacts

The Government is seeking views on:

- a) the general approach it is taking and,
- b) further ideas on how the Government could incentivise the aviation and aerospace sectors to improve aircraft performance with the aim of reducing emissions.

The Government's approach

The Government's policy objective is to ensure that the aviation sector makes a significant and cost effective contribution towards reducing global emissions.¹¹ Its' emphasis is on global action as the best means of securing the objective, with action at European level a potential step towards wider international agreement. Around 95 per cent of UK aviation emissions come from flights departing from UK airports to international destinations.¹² The Government maintains that measures to tackle emissions from UK aviation will need bilateral or multilateral agreement.¹³ It is committed to taking action at national level where appropriate and justified, in terms of the balance between benefits and costs.

The national target

The Climate Change Act 2008 sets a legally binding target to reduce net GHG (greenhouse gas) emissions by at least 80 per cent below the 1990 baseline by 2050.¹⁴

Stakeholders have previously expressed concerns to the Assembly that the national target, while ambitious, appears to have been set without a clear pathway for how it might be achieved.¹⁵ Findings by the Committee on Climate Change (CCC) would appear to support this hypothesis. The CCC report notes that the exclusion of the non-carbon dioxide emissions of aviation – an estimated magnitude equivalent to up to two times that of the carbon dioxide emissions – could have implications for the UK's overall emissions reduction targets.¹⁶ The report also advises that increases in airport passenger numbers across the UK would need to be limited to 60 per cent, instead of the 200 per cent growth forecasted on a 'business as usual' path, if the target is to be met.¹⁷

On the basis of this scenario, aviation could account for 25 per cent of total UK emissions in 2050.¹⁸ Even accounting for improvements in technology and more efficient fuel use, huge efforts will need to be made by society in other areas, such as decarbonised power supply by 2030, electric vehicle use, fully insulated housing stock, to meet the 60 per cent growth. There are clearly critical choices to be made in the run up to 2050. It is therefore imperative that Government take a considered view of all the latest academic research on climate change to enable these choices to be fully informed.¹⁹

¹¹ Paragraph 3.4 Draft Aviation Policy Framework (APF)

¹² Paragraph 3.6 Draft APF

¹³ As per the consultation document – see paragraph 3.6

¹⁴ The level of gross emissions from a particular sector is the actual quantity of emissions emitted by the sector. The net emissions for the sector take account of the emissions allowances or international project credits that it has traded with other sectors

¹⁵ *Flights of Fancy: can an expanded Heathrow meet its environmental targets?* January 2010

<http://www.london.gov.uk/who-runs-london/the-london-assembly/publications>

¹⁶ This approach is consistent with the Kyoto Protocol and the Climate Change Act. Meeting the UK aviation target – options for reducing emissions to 2050, December 2009. <http://www.theccc.org.uk/reports/aviation-report>

¹⁷ <http://downloads.theccc.org.uk/Aviation%20Report%2009/AviationReportPRESSRELEASE08.12.09.pdf>

¹⁸ Page 6, Health and Environment Committee transcript 16 October 2012

¹⁹ Page 10, Health and Environment Committee transcript 16 October 2012. There is a school of thought which argues that a more urgent and radical approach will be needed, requiring a 90 per cent reduction in emissions by 2030 (with interim reductions of 40 per cent by 2015 and 70 per cent by 2020). The paper, *Beyond Dangerous climate change: emissions scenarios for a new world*, 2011, by the Royal Society <http://rsta.royalsocietypublishing.org/content/369/1934/20.full.pdf+html> reports that it is virtually impossible to

A long-term target is essential, alongside a clear sense of the incremental achievements needed and timings for them, to allow for review and/or remedial action as required. The Assembly believes that a phased approach to reducing aviation emissions is needed, setting out short, medium and long term milestones; we previously recommended that these should be legally binding.²⁰ We welcome the CCC's advice to Government earlier this year that aviation should also be included in the five-yearly carbon budget system. We would urge the Government to take this advice on board.²¹

Reliance on an international agreement

Progress on securing international agreement is slower than first anticipated. The Climate Change Summit in Copenhagen presented an unrivalled opportunity to make significant strides forward in tackling aviation emissions on a global scale. It was particularly relevant for the UK given that the CCC aviation report assumes UK action in the context of an international agreement.²² The global agreement reached at the Summit – the 'Copenhagen Accord', fell far short of any legally binding commitments. Agreement has proved elusive in successive summits.

The Assembly acknowledges the commitments by the CAEP (Committee on Aviation Environmental Protection) on behalf of the ICAO (International Civil Aviation Organisation) to agree an international CO₂ standard for aircraft by 2013 which aims to reward and encourage improvements in technology to reduce emissions. Also the agreement between UN Member states and relevant organisations working through ICAO to achieve global aspirational goals of carbon neutral growth from 2020 and average fuel efficiency improvements of two per cent per year up to 2050. The ICAO has recognised that the latter goal *"is unlikely to deliver the level of reduction necessary to stabilise and then reduce aviation's absolute emissions contribution to climate change and that goals of more ambition will need to be considered to deliver a sustainable path for aviation."*²³

The Assembly welcomes the commitment by the industry to improving CO₂ efficiency 1.5 per cent per year on average from 2009 to 2020 to deliver carbon neutral growth through a cap on net emissions from 2020 and to cut net emissions in half by 2050 compared with 2005 levels.²⁴ Net emissions take account of emissions allowances or international project credits that can be traded with other industrial sectors. But it is currently unclear whether these actions will result in a reduction in gross emissions.

Effectiveness of the EU Emissions Trading System (EU ETS)

Research indicates that the inclusion of aviation in the EU ETS will provide only part of the solution over the short-term.²⁵

stabilise the global mean surface temperature at or below 2C by 2050, and recommends taking much more radical short and medium term reductions in emissions, in order to achieve 90 per cent reductions by 2030, otherwise the science indicates temperature increases of 4C by 2050-70, a point beyond adaptation and collapse of most eco-systems. It should be stressed that this view goes beyond the current global consensus, is not necessarily endorsed by the Committee, and should therefore be carefully analysed alongside all the other available evidence.

²⁰ Recommendation 5, *Flights of Fancy: can an expanded Heathrow meet its environmental targets?* January 2010

²¹ Page 9, Health and Environment Committee transcript 16 October 2012. See also <http://www.theccc.org.uk/carbon-budgets>

²² COP15 Copenhagen, Held 7 – 18 December 2009 <http://en.cop15.dk/frontpage>

²³ Declaration by the high-level meeting on International Aviation and Climate Change (HLM-ENV/09) in October 2009 <http://www.icao.int/environmental-protection/Pages/programme-of-action.aspx>

²⁴ Paragraph 3.10 of the consultation document notes that airlines represented by IATA – the International Air Transport Association – have committed to these targets.

²⁵ According to the European Federation for Transport and the Environment, integrating aviation into the EU ETS will do little to reduce aviation emissions. The EU Commission's assessment back in 2008 was that integration of aviation into the EU ETS policy will reduce emissions by just three per cent - Including aviation into the EU Emissions Trading Scheme, updated June 2008

As of 1 January 2012, all flights arriving into and departing from the EU were included within the scope of the EU ETS. Under the EU ETS, these flights are subject to an emissions cap of 97 per cent of average annual emissions between 2004 and 2006. This cap will reduce to 95 per cent in 2013. The two per cent reduction in emissions under the EU ETS is to be welcomed, but cautiously, given the current economic climate and the resulting surplus in permits to purchase additional emissions allowances.²⁶ The limited impact raises the question of whether the cap on aviation emissions under the EU ETS will be sufficient and highlights the need for a reduction in gross emissions as well as net emissions from aviation. Expert opinion is that Europe should be moving to a 30 per cent target as opposed to 20 per cent and that the UK should be pressing for this to happen.²⁷

The CCC says that emissions trading to limit aviation emissions is feasible as part of a range of measures and that it will be useful for an interim period. But that over time aviation emissions growth will have to be carefully managed.²⁸ The Committee has differing views on this. The Conservative Group supports the position of the CCC on this issue, but the majority of the Committee (the Green, Labour and Liberal Democrat Groups) is not confident that the trading scheme can be made workable, or generate a reduction in gross emissions overall.

Reliance on technological advancement

The Assembly acknowledges the considerable effort by the aviation industry over the last 40 years to make aircraft more efficient. Despite this, trends in improvements in aircraft technology are relatively slow when compared to other industries.²⁹ As expressed in the consultation document, the Government should continue to support and encourage technological developments through industry led projects.

There is also scope for the Government to incentivise research into and the use of renewable transport fuels, other than biofuels. According to the CCC, biofuels – fuel whose energy is derived from biological carbon fixation – will account for no more than 10 per cent of the total aviation fuel mix in 2050.³⁰

The national target set is challenging, but necessarily so. What is open to question is whether the existing road map to achieving it, particularly in terms of the contribution the aviation industry will need to make, will be sufficient. Considerable reliance has been placed on reaching an international agreement, and with little outcome to date. It appears that a more rigorous approach to the EU ETS will be needed and progress in making aircraft more efficient will need to be stepped up. Crucially, even working on the assumption that all three elements – international agreement, the EU ETS and technology improvement – are progressing at the desired pace, significant life-style and industry changes will be required over the next 30 to 40 years.

²⁶ <http://www.guardian.co.uk/environment/2012/may/15/eu-airline-emissions-tax-success>

²⁷ Page 13, Health and Environment Committee transcript – comments from Sir Brian Hoskins

²⁸ Lord Turner's Letter to Ministers, dated 9 September 2009. Available at <http://hmccc.s3.amazonaws.com/CCC AviationLetterSoS%2009.09.09.pdf>

²⁹ Meeting of the Environment Committee, 5 November 2009 This view was expressed by Dr Sam Fankhauser of Grantham Institute for Climate Change and a member of the CCC

³⁰ Carbon fixation is the conversion of carbon dioxide into organic compounds by plants

Chapter 4 - Noise and other local environmental impacts

This section of the response presents the Assembly's views on the Government's overall objective on aviation noise, the appropriateness of the current method used to describe noise impact and determine noise contours, the case for reducing noise exposure levels, and the adequacy of approaches to mitigating and compensating noise impacts. This section also covers night noise and air quality impacts.

From time to time reference will be made to Heathrow airport, given that:

- a) it is based in London and accounts for around 70 per cent of people in the UK exposed to average noise from airports above 55 decibels (dB) – the level at which the World Health Organisation has said that people become seriously annoyed by noise,³¹ and
- b) More than one in four people exposed to this level of noise around European airports lives near Heathrow.³²

There are limits to what further improvements can be made to the noise generated by individual aircraft, with existing design and configuration.³³ Therefore the main levers for managing noise levels on the ground are controls on how many aircraft can fly overhead, where and when.

The Government's overall objective on aviation noise

The Government has adopted the high-level policy objective on aircraft noise set out in the previous administration's 2003 white paper, *The Future of Air Transport* – to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise.³⁴ The objective is consistent with the *Noise Policy Statement for England* (NPSE) published in March 2010.³⁵

More and more London residents are being affected by noise from aircraft. Historically aircraft noise through Heathrow was previously considered to be a fairly contained problem, affecting residents to the west of London. But in just over a decade the problem has spread to the south east and east of London affecting residents living up to 20 kilometres away from the airport.³⁶ Residents in these areas and also to the north of London are increasingly affected by noise from aircraft arriving and leaving London City Airport. In some cases residents have to bear the combined impact of aircraft noise from both airports. Stacking increases exposure to noise as capacity increases.

The Assembly therefore welcomes the Government's policy approach and its commitment to establish a framework that incentivises noise reduction and mitigation more strongly, and encourages better engagement and greater transparency between airports and local communities.

³¹ The World Health Organisation (WHO) is the directing and coordinating authority for health within the United Nations. It provides leadership on global health matters, shaping the health research agenda, setting norms and standards, articulating evidence-based policy options, providing technical support to countries and monitoring and assessing health trends.

³² Frankfurt, Paris Charles de Gaulle, Amsterdam Schiphol and Madrid, source page 49 draft APF

³³ Page 15, Health and Environment Committee transcript 16 October 2012

³⁴ *The Future of Air Transport*, DfT, December 2003,

<http://webarchive.nationalarchives.gov.uk/+/http://www.dft.gov.uk/about/strategy/whitepapers/air/>

³⁵ <http://www.defra.gov.uk/environment/quality/noise/npse>

³⁶ *All Change, Aircraft noise is no longer just a West London problem*, HACAN, March 2011

Noise contour measurement methods and thresholds

The Government is minded to retain the previous administration's policy to use the 57 dB LAeq,16h contour as the average level of daytime aircraft noise marking the approximate onset of significant community annoyance.

The Assembly is concerned with two key aspects of this approach: the measurement used and the threshold that is applied.

Simply put the measurement used for assessing noise pollution is based on averages, meaning that the actual number of flights is not fully reflected. In practical terms this results in an underestimation of the extent of the noise problem around an airport, and the number of people affected.

UK daytime aircraft noise is measured using the method LAeq, more commonly abbreviated to Leq.³⁷ While Leq is recognised as the most common international measure of aircraft noise, drawbacks to the measurement are also well documented.³⁸ The Government commissioned study, *Attitudes to Noise from Aviation Sources in England* (ANASE) concluded that the method of calculating noise, adopted since the eighties, was too narrow and failed to take account of either the growth in the number of flights or increasing public intolerance to noise. It recommended using an index, which would better reflect the number of flight events.³⁹

The 57 dB LAeq contour, the level at which the Government deems individuals become annoyed at noise, does not fully reflect the numbers of people affected by aircraft noise and is inconsistent with EU requirements for drawing up noise action plans. The EU requires Member States to draw up noise action plans using a measure called Lden, and applying a threshold of 55dB⁴⁰. The Lden approach takes the combined effect of noise levels during the day, evening and night and averages them over a 24-hour period. But crucially, it weights the evening and night noise levels by adding 5dB and 10dB respectively to reflect the greater nuisance of noise at those times.

Results from aircraft noise mapping for Heathrow airport in 2006 show that an estimated 725,000 people were within the 55dB Lden noise contour (the EU threshold for noise action plans), compared to the 253,700 that are shown to be affected within the 57dBLAeq noise contour.⁴¹ The World Health Organisation (WHO) suggests that the 57dB LAeq measurement is outdated, and notes that the thresholds of 50dB (for moderate annoyance) and 55dB (for serious annoyance) better reflect individuals' experiences.⁴²

Research by the campaign group HACAN shows that over two and half million people would be affected if a 50dB threshold were applied. This means that the affected area around Heathrow airport would extend into parts of South East and North London, and beyond Maidenhead to

³⁷ The Leq method records individual plane noise in decibels and averages them out over a 16-hour day, between 7am and 11pm. The resulting figure is then averaged out over the year. As the measurement is based on averages it includes quiet periods when there are no planes, and excludes night-time flights and the busiest period of the day (6 to 7am), when both runways at Heathrow are used for landing. Information sourced from HACAN briefing note on airport related noise pollution, available at

<http://www.hacan.org.uk/resources/briefings/hacan.briefing.noise.pdf>

³⁸ The BAA written submission to the London Assembly Environment Committee notes that Leq is the most common international measure of aircraft noise.

³⁹ Published November 2007. Available at <http://www.dft.gov.uk/pgr/aviation/environmentalissues/Anase/>

⁴⁰ Directive 2002/49/EC requires EU Member States to produce noise maps in 2007 using the Lden noise metric. Lden takes the noise levels during the day, evening and night and averages them over a 24-hour period. But crucially the evening and night noise levels are weighted by adding 5dB and 10dB respectively to reflect the greater nuisance of noise at those times.

⁴¹ Page 22, Heathrow Airport Noise Action Plan 2010-2015

⁴² Guidelines for community noise, World Health Organisation 1999
<http://www.who.int/docstore/peh/noise/guidelines2.html>

the West.⁴³ Anecdotal evidence shows that residents are already significantly affected by aircraft noise in areas such as Clapham, Vauxhall, Stockwell, Camberwell, Kennington Park and Blackheath.⁴⁴

The relationship between daytime Leq and Lden will depend on the pattern of operations at an individual airport, however, the overall outcome is that a 55dB Lden threshold shows that more people are 'affected' by noise than by the 57dB Leq threshold.

The Government's method for measuring noise impacts should be consistent with the EU requirements for noise action plans. In light of the growing recognition of the need to review the 57dB LAeq method for measuring noise, Government must take the opportunity to review its approach, and seek to bring it in line with EU requirements.

The need to retain respite for local people

Runway alternation is a valuable way of providing relief from aircraft noise to residents in West London. The Assembly cannot condone the introduction of an operational change that would deny residents such relief, and have a detrimental impact on their health. Analysis of data from the first phase of the ongoing operational freedoms trial at Heathrow shows that significantly more residents' quality of life is being affected, with them noticing an increase in the frequency and noise from aircraft.⁴⁵

Mitigating and compensating noise impacts

The Assembly recognises that qualifying thresholds for mitigation and compensation vary considerably and that there can be plausible reasons for this. A recently published comparative study of airport noise insulation grant schemes highlights the wide variance in the thresholds identified by airports world-wide.⁴⁶ However we are concerned by the inconsistency that is evident within the Greater London boundary and believe that there is scope to redress this, and develop a strategic approach to recognising and mitigating the impacts of aircraft noise across London.

It is becoming increasingly apparent that there is a need for a strategic approach to noise mapping across London. Residents in areas in east London, such as the Docklands, have, in recent years, begun to experience combined increased levels of noise from aircraft serving London City Airport and Heathrow. The noise contours for both airports are drawn up separately. We understand that this situation may possibly apply to parts of south east London, such as Lewisham.

The absence of joint contours in those areas where there are a significant number of both Heathrow and City aircraft completely underestimates the actual noise that is being heard. We would urge the Department for Transport in conjunction with the Civil Aviation Authority to consider the scope for developing joint contours or other indicators, such as flight path density plots, or noise event-based measures, for those areas of London where residents and communities are affected by the joint impact of noise from aircraft flying to and from Heathrow and London City Airports.

There should be consistency in mitigating and compensating for aircraft noise impacts. The noise mitigation scheme at London City Airport is currently based on the 57dB LAeq contour,

⁴³ Aircraft Noise and London Heathrow Flight Paths, February 2007, Bureau Veritas, Acoustics and Vibration Group. (commissioned by HACAN) Available at <http://www.hacan.org.uk/resources/reports/st06145.text.final.pdf>

⁴⁴ All Change, Aircraft noise is no longer just a West London problem, HACAN, March 2011

⁴⁵ <http://www.heathrowairport.com/noise/noise-in-your-area/operational-freedoms-trial>

⁴⁶ Page 9, Comparison of Airport Noise Insulation Grant Schemes – An Update, by Bureau Veritas on behalf of London Borough of Hounslow, June 2011

while at Heathrow it is 69dB LAeq. Both thresholds are considerably above the 55dB recognised trigger point for serious annoyance by noise. Heathrow is proposing to adopt the Lden metric thereby reducing the threshold to 63dB. This is a welcome step in the right direction, as the move will narrow the gap between the respective thresholds, but we believe more should be done. At Heathrow the 57 LAeq contour would equate to the 59dB Lden contour at any given point around the airport.⁴⁷ We have previously urged Heathrow airport to apply a 59dB Lden threshold in its revised mitigation scheme. Over time we would wish to see a lower threshold adopted by both airports.

Night noise

The Assembly welcomes the Government's planned consultation on the arrangements for managing night time flights at Heathrow, Stansted and Gatwick airports later this year. We welcome the inclusion of a review of the costs and benefits of night flights and current literature on aviation night noise health impacts. We intend to submit a full response to the consultation but think it worth reiterating here a number of points raised by the Assembly publication, *Plane Speaking*, earlier this year.⁴⁸

Our report stressed the importance of a comprehensive review of the latest evidence on the adverse health impacts of night aircraft noise, including a cost benefit analysis. It also called for the consultation to take full account of the publication of the WHO Night Noise Guidelines for Europe in 2009.⁴⁹ For as long as any night flights continue, for example, during a phase-out period, consideration should be given to modifying the current night rotation scheme to change runway use/direction nightly, rather than on a weekly cycle, so that, if people's sleep is disturbed on one night, they may have a greater chance of catching up on the following night.

Air quality and other local environmental impacts

Poor air quality is a London-wide problem, but particularly so around Heathrow. There has been little improvement in concentration levels of two key pollutants – NO₂ and particulate matter (PM₁₀), since 2001/02. Areas around Heathrow are already in breach of European Union (EU) air quality limits.

The Assembly has recently published two reports that consider air quality impacts quite extensively.

The first, *Flights of Fancy, can an expanded Heathrow meet its environmental targets*, in 2010 examined the environmental conditions attached to the previous Government's expansion plans for Heathrow Airport. Among the key issues the report identified, are: the lack of a co-ordinated package of mitigation measures to reduce nitrogen dioxide (NO₂) concentration levels around Heathrow; concerns over the perceived disproportionate reliance on aircraft technology, and inadequacy of existing and proposed transport measures to mitigate air pollution levels, plus the lack of clarity around enforcement of the air quality condition. [See pages 22 to 28.](#)

The second, *Plane Speaking: air and noise pollution around a growing airport 2012*, follows on from *Flights of Fancy* reviewing progress made by Heathrow Airport to address air and noise pollution around the airport. The report proposed addressing air pollution by: increasing use of greener, quieter aircraft, ensuring on-site vehicles meet the latest EU emissions standards, and reducing airport related road traffic. The report also highlights a range of issues that will need to

⁴⁷ Local Authorities' Aircraft Noise Council consultation response to Heathrow's review of its noise mitigation schemes, August 2011 available at www.laanc.org.uk

⁴⁸ *Plane Speaking: Air and noise pollution around a growing Heathrow Airport*, March 2012
<http://www.london.gov.uk/who-runs-london/the-london-assembly/publications>

⁴⁹ A copy can be downloaded at <http://www.euro.who.int/en/what-we-do/health-topics/environment-and-health/noise/publications/2009/night-noise-guidelines-for-europe>

be tackled to improve surface access to the airport and to encourage passengers and employees to use public transport more for their journeys to and from the airport. [See pages 17 to 30.](#)

Chapter 5 - Working together

The Government is seeking views on how local collaboration might be and transparency might be improved. This section of the response presents the Assembly's views on the role of Airport Consultative Committees and the role of the Civil Aviation Authority.

Airport Consultative Committees (ACC)

The Assembly welcomes the Government's commitment to see ACCs play a more effective role; they provide a useful forum within which to seek input from a wide range of stakeholders. Our response on the noise impacts of aviation highlights the growing inter-relationships between Heathrow and London City Airports, such as the overlapping of flight paths, and differences in approaches to mitigation and compensation.

We consider that there would be merit in enhancing arrangements for inter-airport liaison in recognition of this growing relationship. Both airports have Consultative Committees which provide opportunities for monitoring issues and exchanging views between interested parties, including local authorities, stakeholders and the airport operator. Government guidelines strongly encourage interaction between Airport Consultative Committees where appropriate. Periodic joint meetings of the Heathrow and London City Airport Consultative Committees could be trialled, on an annual or bi-annual basis.

The role of the Civil Aviation Authority (CAA)

The Environment Committee's review of the environmental conditions attached to expansion at Heathrow highlighted the complexity of the governance structure for managing them. Accountability effectively spans three Government departments, (the Department for Transport, Department for Environment, Food and Rural Affairs and the Department of Energy and Climate Change), two regulatory bodies, (the Environment Agency and CAA), and the Committee on Climate Change.

The complex governance structure has not helped in facilitating transparency and improved communication with local communities. Our report, *Flights of Fancy*, called for a simplification of the governance structure to allow for a single reference point.

We welcome the conclusion of the Pilling Review that the CAA should have a general statutory duty in relation to the environment and that this should be executed within a clear policy framework set by the Government.⁵⁰ In our response to the Government consultation on its proposals to update the Regulatory Framework for aviation, we noted that the Government's review could be an appropriate juncture at which to consider whether a more stringent environmental objective to prioritise environmental considerations in exercising the regulatory function is needed, and whether the CAA is best placed to deliver on the objective. We believe that the UK's specialist aviation regulator should keep environmental considerations at the forefront of its agenda. We were pleased to hear that the CAA is interpreting its duty in this context.⁵¹

⁵⁰ Sir Joseph Pilling, Report of the Strategic Review of the CAA, 2008

⁵¹ Page 2, Health and Environment Committee transcript, dated 16 October 2012

In our report, *Flights of Fancy*, we noted stakeholder concerns about the lack of independent scrutiny of the noise action plans that are drawn up in the UK.⁵² The airport operator, for example in Heathrow's case BAA, is responsible for setting targets and actions for managing and abating noise nuisance, and for recording outcomes and monitoring progress. We understand that elsewhere in Europe the approach is to appoint an independent third party to draw up the plans. We would wish to see further research carried out on this point, and believe that the Government should examine and draw lessons from how noise action plans are drawn up by other Member States.

Earlier in our response we referred to the growing need for a strategic approach to noise mapping in London. In our view the CAA in conjunction with the Department for Transport would be best placed to deliver this.

There is also merit in the suggestion that an independent body administer the airport mitigation and compensation schemes. This could help rebuild the trust that has been lost by local communities in how airport operators seek to manage, mitigate and compensate for the negative environmental impacts that can arise from airport operations. We were pleased to hear that those within the aviation industry see a potential role for enhanced independent regulation and are open to looking at it as part of tackling the 'trust deficit' that exists between airport operators and local communities.⁵³

⁵² Page 18, *Flights of Fancy* can an expanded Heathrow meet its environmental targets

⁵³ Page 31, Health and Environment Committee transcript 16 October 2012